

## INFORMATION NOTICE ON THE PROCESSING OF SKIPASS PURCHASERS' PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Dear Client,

By means of this information notice, in compliance with the provisions of Regulation (EU) 2016/679 (hereinafter, the "GDPR"), Courmayeur Mont Blanc Funivie S.p.A. intends to provide you with the following information regarding the processing of personal data, carried out in relation to the purchase of skipasses and the consequent contractual relationship with the Company.

**Introduction.** "Ski station pass" means: a) all passes that are solely valid for the access to the ski resorts managed by the Company, and b) the products defined as "Mont Blanc Unlimited". For these products only, the Joint-Controller for the processing, under Article 26 of Regulation (EU) 2016/679, is Compagnie du Mont Blanc.

"Pass with a VDA extension" means all passes that are also valid in the other Aosta Valley ski resorts, on the Mont Blanc cable cars and in the La Rosière, Alagna and Alpe di Mera ski resorts for a limited and predetermined number of days. "Regional Pass" means all passes that are valid in all the Aosta Valley resorts, on the Mont Blanc cable cars and in the La Rosière, Alagna and Alpe di Mera ski resorts. "Station" means the ski resorts managed by the Company Courmayeur Mont Blanc Funivie S.p.A.

1. **Data Controller.** The Data Controller for the processing of the data disclosed for the purchase of skipasses is Courmayeur Mont Blanc Funivie S.p.A., with registered office in Courmayeur (AO) Strada Dolonne – La Villette n. 1/b – Italy, in the person of its pro tempore legal representative.
2. **Data Protection Officer (DPO).** Pursuant to Article 37 of the GDPR 2016/679, the Company appointed a Data Protection Officer. The DPO's contact details are available on the Company's website [www.courmayeur-montblanc.com](http://www.courmayeur-montblanc.com), in the Contacts – Privacy section.
3. **Joint Controllers for the processing.** By virtue of a specific agreement, with reference to the "Regional pass" and the "Pass with a VDA extension", the companies Pila S.p.A., Cervino S.p.A., Funivie Monte Bianco S.p.A., Funivie Piccolo San Bernardo S.p.A., and Monterosa S.p.A. shall be Joint Controllers for the processing pursuant to Article 26 of the GDPR 2016/679. Pursuant to an adding agreement, with reference to the products defined as "Mont Blanc Unlimited", the company Compagnie du Mont Blanc shall be Joint Controller for the processing.
4. **Source of the personal data.** The data may be collected directly from the data subject, or through the Joint Controllers for the processing, or through persons, whether natural or legal, appointed as external Processors. The detection of accesses to turnstile gates is carried out electronically. A video surveillance system is installed in the areas managed by the Company: images are collected electronically. With regard to the relevant processing, please see the specific information notice available in the "Privacy" section of the website [www.courmayeur-montblanc.com](http://www.courmayeur-montblanc.com).
5. **Types of processed data.** In order for the purchase of skipasses to be made, the disclosure of identification data (first name, family name, date of birth, and fiscal code) and contact details (home address) is required. Only for some types of skipasses the release of a photograph is required (for the sole purpose of verifying that the access is carried out by the entitled person). When required, also banking data (credit card number or IBAN code) may be possibly processed in order for the payment to be completed. For marketing purposes, with specific consent, contact details, such as telephone number or email address, may be processed. As part of the video surveillance system, images of users are processed. The detection of accesses to turnstile gates involves the processing of localization or position data, which is carried out by reading the RFID technology tags. In order to apply any discounted rates, the Company may process - subject to the consent of the data subject - data that Article 9 of the GDPR 2016/679 defines as "special" insofar as suitable for revealing information relating to the state of health. The processing of such data is limited exclusively to carry out the assessment regarding the applicability of the discounted rate.
6. **Detection of the accesses to turnstile gates.** In order to prevent unlawful uses of passes and to facilitate any search for missing persons, the Company adopts an RFID-technology system for the detection of accesses to turnstile gates. The interaction between the pass and the reader device mounted on the turnstile gates allows a "free-hand" access, without the need to insert any pass, and enables to verify the entitlement to the access. The device does not collect any biometric data and does not store the movements of the user within the ski slopes or hiking trails. In the event that the Company intends to use the data in order to profile any customer preferences, it shall request a specific consent from the data subjects.
7. **Purpose of, and legal basis for, processing.** The processing of your data is carried out for the following purposes and based on the legal bases indicated in correspondence with each of them as follows:

	PURPOSE OF THE TREATMENT	LEGAL BASIS FOR THE TREATMENT
1	Collection of requests for purchase and subsequent issuance of passes.	<b>Article 6(1)(b) of the GDPR 2016/679:</b> processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
2	Payment management (with the related processing of payment data, including any credit card identification details, pursuant to applicable law).	<b>Article 6(1)(b) of the GDPR 2016/679:</b> processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
3	Fulfilment of civil, fiscal and accounting obligations connected with the issue of passes and provision of any first aid operations in cases where payment of a fee is envisaged.	<b>Article 6(1)(c) of the GDPR 2016/679:</b> processing is necessary for compliance with a legal obligation to which the Controller is subject.
4	Provision of transport services and guarantee of their use by the purchaser.	<b>Article 6(1)(b) of the GDPR 2016/679:</b> processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
5	Protection of the Company's assets through the use of video surveillance systems.	<b>Article 6(1)(f) of the GDPR 2016/679:</b> processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
6	Protection of the Company's assets through verification of the legitimate use of the pass by requesting the application of a photograph on the pass.	<b>Article 6(1)(f) of the GDPR 2016/679:</b> processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
7	Protection of the Company's assets through verification of the legitimate use of the pass (the application of a photograph on the pass is required).	<b>Article 6(1)(f) of the GDPR 2016/679:</b> processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.

8	Protection of the Company's assets through detection of accesses to turnstile gates.	<b>Article 6(1)(f) of the GDPR 2016/679:</b> processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
9	Assessment of the applicability of discounted rates.	<b>Article 9(2)(a) of the GDPR 2016/679:</b> consent by the data subject.
10	Marketing and promotion activities regarding commercial initiatives, products, and/or services.	<b>Article 6(1)(a) of the GDPR 2016/679:</b> consent by the data subject.
11	Any defense of a right in Court and whenever the assessment, exercise or defense of a right of the Data Controller is necessary.	<b>Article 6(1)(f) of the GDPR 2016/679:</b> processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party.
12	Any activity of first aid in case of injury.	<b>Article 6(1)(d) and Article 9(2)(c) of the GDPR 2016/679:</b> processing is necessary in order to protect the vital interests of the data subject.
13	Statistical analyses of the data in order to develop and improve the services offered.	<b>Anonymized data</b>

- 8. Methods for the processing and storage period.** The data processing shall be carried out either manually or by electronic means, on paper or electronic devices, pursuant to Article 32 of the GDPR 2016/679 on the security of processing. The data collected for the purposes under paragraphs 1, 2, 4, and 9 above shall be stored for the duration of the contractual relationship and, subsequently, for a period of 3 years. After this term, the data shall be made anonymous and stored for statistical purposes with the sole exception of those for which, in fulfillment of the purposes referred to in paragraph 3 above, there is an obligation to store the data for tax purposes or for compliance with regulatory requirements (storage period: 10 years). In this case, storage is limited to the purposes set out in paragraph 3 above. The images collected through video surveillance systems are deleted 72 hours after collection (without prejudice to the cases of transmission to the Judicial Authority); the data collected for marketing purposes are kept until you object or revoke your consent. The data collected for the purposes referred to in paragraphs 7 and 8 above are stored for 3 years and then anonymized and stored for statistical purposes only. The data collected for the purposes referred to in paragraph 12 above are stored for 10 years if the activity involves a fee and a consequent invoicing obligation; and for 3 years in all other cases. In all cases in which a proceeding is necessary to assess, exercise or defend a right of the Data Controller, the storage period continues until the completion of the judicial process.
- 9. Nature of the data collection.** The provision of data for the implementation and execution of the contractual relationship is mandatory: the refusal to provide them will make it impossible to proceed. In relation to the purposes of promotion and marketing, the provision is optional: the lack of consent does not affect the execution of the contract.
- 10. Persons authorized to process personal data.** The employees of the Company who carry out data processing activities have been expressly authorized to do so in accordance with Article 29 of the GDPR 2016/679. The authorization includes specific instructions and limitations - according to the task carried out - regarding the manner in which to carry out said processing, as well as a commitment to confidentiality regarding the content of the aforementioned data.
- 11. External Processors.** For its activities, the Company uses persons, whether natural or legal, which, based on a contract or a specific task, may process personal data on behalf of the Controller. These persons have been appointed as "Processors" pursuant to Article 28 of the GDPR 2016/679, with a commitment to comply with the contents of the aforementioned Regulation. The list of Processors is made available to interested parties upon written request.
- 12. Data disclosure.** For the purposes referred to in paragraph 7 above, or in fulfillment of legal or regulatory obligations, the data may be disclosed to Company bodies, as well as to Legal Persons or Public Bodies, such as, for example, but not limited to: the Joint Controllers for the processing listed in paragraph 3 above (within the limits of the agreements signed with them); Banks; Insurance Companies; persons carrying out rescue operations on the slopes (such as, for instance, the Red Cross, the Italian national health system (USL), etc.); the Members of the Board of Directors, the Board of Statutory Auditors or the Supervisory Board of the Company in the exercise of their respective functions; legal advisors in case of litigation; and the Judicial Authority in the event of a grounded provision or the need to protect a right of the Controller. Only after explicit consent they may be communicated to third parties for marketing purposes. The data may also be disclosed to persons who carry out the processing on behalf of the Data Controller, appointed as external Processors pursuant to Article 28 of the GDPR 2016/679, and to employees authorized pursuant to Article 29 of the GDPR 2016/679. The persons belonging to the categories to which the data may be disclosed will carry out the processing, depending on the case, as Data Processors or as autonomous Controllers.
- 13. Data disclosure.** The data provided are not subject to disclosure.

### **RIGHTS EXERCISABLE BY THE DATA SUBJECT**

Courmayeur Mont Blanc Funivie S.p.A ensures the data subjects the exercise of their **right of access** pursuant to Article 15 of the GDPR 2016/679, and, where applicable, of their **right to rectification** (Article 16 of the GDPR 2016/679), of their **right to erasure** (Article 17 of the GDPR 2016/679), of their **right to restriction of processing** (Article 18 of the GDPR 2016/679), of their **right to data portability** (Article 20 of the GDPR 2016/679), of their **right to object to the processing** (Article 21 of the GDPR 2016/679), and their **right to withdraw consent**. Without prejudice to any other administrative or jurisdictional appeal, should he or she consider that the data processing is carried out in violation of the GDPR 2016/679 or of the Legislative Decree of 30 June 2006 no. 196, as amended by Legislative Decree of 10 August 2018 no. 101, data subjects have the right to lodge a complaint with the Italian Data Protection Authority, by following the procedures and instructions published on the official website of the Authority [www.garanteprivacy.it](http://www.garanteprivacy.it).

Requests relating to the exercise of the abovementioned rights must be sent in writing, by registered mail, to the registered office of the Company or by notice to the Data Protection Officer (at the address indicated on the website [www.courmayeur-montblanc.com](http://www.courmayeur-montblanc.com), in the Contacts – Privacy section).

The deadline for responses to requests relating to the exercise of the rights referred to in paragraphs 1 to 4 above is 30 (thirty) days, extendable up to 3 (three) months in case of particular complexity (assessed by the Controller).