

Data Privacy Statement

Skiregion Adelboden-Lenk ("SKIREGION") hereby publishes its data protection declaration regarding the collection of personal data during your visit to the SKIREGION websites. By accessing the SKIREGION websites, you agree to this privacy policy. Please note that in the course of both content and technical development of these websites, as well as new legal regulations, specific updates of this data protection declaration may become necessary. For this reason, we recommend that you re-acquaint yourself with our terms and conditions of use on a regular basis.

Definition of "personal data"

"Personal data" means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

As a visitor to the SKIREGION websites, personal data is all data that personally relates to you, e.g. name, address, e-mail address or user behaviour.

Type, scope and intended use of personal data

We process your personal data for the following purposes:

- Processing of purchases and orders
- presentation as well as technical and content-related optimisation of our websites
- enquiries via the contact form
- newsletter registration
- data security and security of websites
- production of user statistics
- marketing purposes

Presentation of the websites

When visiting the SKIREGION websites, our servers automatically store the following data on a temporary basis:

- the IP address of the requesting computer
- the date and time of access
- the name and URL of the retrieved file
- the website from which the access was made
- the operating system of your computer and the browser used
- the country from which access was made and the language settings of the respective web browser
- the name of the Internet access provider

When visiting the SKIREGION websites, the user gives express consent to the temporary storage of the IP address of the terminal device (see GDPR Art. 6, para. 1(a)). This data is stored and processed at short notice to enable the utilisation of SKIREGION websites (connection set-up), to permanently guarantee system security and stability, to optimize our Internet product, and to keep internal statistics. The data will be deleted as soon as it is no longer necessary to achieve these purposes. Further data processing or personal evaluations do not take place, except in connection with technical security incidents, conduct contrary to contract, or criminal acts.

Use of our contact form

You have the option to use a contact form to get in touch with us. Entry of the following personal data is mandatory except where indicated:

- title
- first and last names
- address (street, house number, town, postcode (optional))
- phone number (optional)
- e-mail address

We will indicate the mandatory sections; failure to provide this information may restrict the provision of our services. Providing other information is optional and does not influence the use of our website. We use this data only to be able to answer your contact enquiry in the best and most personalised way possible. Our interest in your contact enquiry is within the meaning of GDPR Art. 6, para. 1(f).

Contributions and comments

If you make a contribution or leave a comment on this website, your IP address will be stored. This is done on the basis of our legitimate interests within the meaning of GDPR Art. 6, para. 1(f) and serves as security for us as website operators. If your comment is unlawful, we can be sued for it, and for this reason we need to know the identity of the person making the contribution/comment.

Registering for our newsletter

On our website, you have the possibility to subscribe to our newsletter. This requires registration with the following data:

- e-mail address
- title, first and last names (optional)

This data is needed to personalise the information and offers sent to you and to tailor them better to your interests. By registering, you authorise the processing of the data provided for the regular dispatch of our newsletter to the e-mail address you have provided. SKIREGION also uses this data for statistical evaluation of user behaviour and optimisation of the newsletter. This consent constitutes our legal basis for processing your e-mail address within the meaning of GDPR Art. 6, para. 1(a).

We use third-party e-mail marketing services to send our newsletter. Our newsletter may, therefore, contain a so-called web beacon (tracking pixels) or similar technical devices. A web beacon is a 1x1 pixel, an invisible graphic associated with the user ID of the respective newsletter subscriber. The use of such services allows the evaluation of whether the e-mails containing our newsletter have been opened. Also, the click behaviour of recipients can also be recorded and evaluated. We use this data for statistical purposes and to optimise the newsletter regarding content and structure. This enables us to tailor the information and offers better to the individual interests of each recipient. The pixel-code is deleted when you delete the newsletter. To prevent tracking pixels in our newsletter, set your mail program so that no HTML is displayed in messages.

You can unsubscribe at any time using the link at the end of each newsletter. In this context, you can optionally inform us of the reason for cancellation. Your personal data will then be deleted. Further processing will only take place in an anonymous way to optimise our newsletter.

Registering for our image database

A selection of pictures can be obtained from the database via our website. In principle, no personal account is necessary. However, it is advisable to register, especially for frequent visits. To do this, we need the following information from you:

- e-mail address
- free-chosen password

Bookings and reservations

Through our websites, you can book or reserve offers in various ways and order printed information or other services. Third parties provide the corresponding services. Customers will be informed about the forwarding to our partners on the relevant subpages. Depending on the service, various personal data is collected, such as:

- title and/or company
- first and last names
- address (street, house number, postcode, town, country)
- further contact details (e-mail address, telephone number)
- Photo (if required)
- Number of Skipass (if required)
- credit card details (if required)

Without the information marked as mandatory, the booking services may not function optimally. Only personal data which is necessary for the fulfilment of the service concerned is passed on. The legal basis for this is found in the conclusion of a contract within the meaning of GDPR Art. 6, para. 1(b).

Participation in competitions

When participating in competitions offered on this website, personal data, i.e. title, first name, surname, address, postcode/town and e-mail address, are collected. This data is required for the implementation of the competition, in particular, the allocation of the applications to the respective participants and the determination and notification of the winners - in accordance with the competition conditions and GDPR Art. 6, para. 1(b) for contract fulfilment. By participating in the competition, the user gives his/her express consent (see GDPR Art. 6, para. 1(a)) that his/her personal data entered may be stored by SKIREGION and used for the implementation of the relevant competition and for determining and notifying the winners. The personal data received will only be processed and used by SKIREGION to the extent necessary for the conduct of the competition. The personal data of the respective participant will be stored for the duration of the competition or a maximum of three years and then deleted.

Webcams

The service providers of the Adelboden-Lenk-Kandersteg destinations have installed webcams at various locations. The purpose of these webcams (cameras) is to provide images of current on-site conditions. Live streaming can be found on SKIREGION websites and is therefore in the public domain. This data processing is carried out in accordance with GDPR Art. 6, para. 1(e) for the performance of a task that is in the public interest.

Personalised marketing

On our websites, we use so-called social media plug-ins (interfaces to social networks) and pixels to display personalised advertising and to utilise web analysis services. More details about this can be found below. On our website, we offer personalised services and information (on-site targeting). For this purpose, we collect, use and analyse the data generated when you visit SKIREGION websites. So-called "cookies" may also be used (see below). The analysis of your user behaviour can also lead to the creation of a so-called user profile. However, the data is merged exclusively using a pseudonym.

Social media plug-ins

Social media plug-ins are used on our website. We currently use the following social media plug-ins: [Facebook, Twitter, Instagram, YouTube]. These elements are disabled by default on our website and therefore do not send data. You can activate the plug-ins by clicking on the corresponding social media button. In this case, your web browser establishes a direct connection to the servers of the respective social network as soon as you visit one of our websites. The content of the plug-in is transmitted directly from the social network to your web browser and integrated into the website. The plug-ins can be deactivated with one click. SKIREGION does not influence the data collected by the respective social networks. Further information regarding the data collected and data processing processes can be found directly on the respective social networks and their individual data protection declarations.

The plug-in provider stores data collected about you in the form of user profiles and utilises these for advertising, market research and/or demand-oriented design of its website. Such an evaluation takes place (also for not-logged-in users), in particular, for the representation of needs-based advertisement and to inform other users of the social network about your activities on our website. You have a right of objection to the creation of these user profiles and to exercise this right, you must contact the respective plug-in provider. Through these plug-ins, we offer you the opportunity to interact with social networks and other users, so that we can improve our product and make it more interesting for you as a user. The legal basis for the use of plug-ins is GDPR Art. 6, para.1(f).

Data is transferred regardless of whether you have an account with the plug-in provider and are logged-in there. If you are logged-in with the plug-in provider, your data collected through us will be assigned directly to your existing account with the plug-in provider. If you click the activate button and, for example, link the page, the plug-in provider also stores this information in your user account and shares it publicly with your contacts. We recommend that you log out regularly after using a social network, especially before activating the button as, in this way, you can avoid being assigned to your profile with the plug-in provider.

For more information on the purpose and scope of data collection and its processing by the plug-in provider, please refer to the data protection declarations of the providers shown below. They will also provide you with further information about your rights in this regard and settings to protect your privacy.

Addresses of the respective plug-in providers and URL with their data protection information:

- a) **Facebook**, Inc., 1601 S California Ave, Palo Alto, California 94304, USA; <http://www.facebook.com/policy.php>; further information about data collection: <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> <http://www.facebook.com/about/privacy/your-info#everyoneinfo>
Facebook is subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- b) **Twitter**, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA; <https://twitter.com/privacy>.
Twitter is subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- c) **Instagram**, Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA. Information regarding the processing of your personal data by Instagram can be found in their privacy policy: <http://instagram.com/about/legal/privacy/>
- d) **YouTube**, LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. For more information on the handling of user data, see YouTube's privacy policy: <https://www.google.de/intl/de/policies/privacy>

Cookies

Definition, types and use

SKIREGION websites use so-called "cookies." These are small information files that your web browser automatically stores on your computer's hard drive when you visit our websites. Cookies cannot run programs or transmit viruses to your computer. They function only to make SKIREGION websites more user-friendly and effective overall.

SKIREGION uses the following types of cookies on its websites:

- **Session cookies:** temporary files that are deleted when the web browser is closed;
- **Persistent cookies:** these cookies remain when the web browser is closed, but the user can delete them;
- **Obligatory cookies:** these are cookies that are required for the operation of the website. These include, for example, cookies that allow you to log into secure areas of the website.

Cookies from third parties (e.g. Google Maps and Google Analytics) are also used on SKIREGION websites. They are used to monitor your online behaviour on SKIREGION websites. This is done for the purpose of needs-based design and continuous optimisation of our websites. Their operation and purposes are described in more detail below. However, you can configure your web browser so that no cookies are stored on your computer, or a message always appears when you receive a new one. However, disabling cookies may prevent you from using all the features of our websites.

Google Maps

We use the component "Google Maps" from Google Inc. 1600 Amphitheatre Parkway, Mountain View, CA 94043 USA, hereafter also "Google."

Each time you access the Google Maps component, Google sets a cookie to process user settings and data when you view the page that includes the Google Maps component. As a rule, this cookie is not deleted when you close your browser, but expires after a certain period, unless you delete it manually beforehand. The use of Google Maps is in the interest of an appealing representation of our online products and makes it easy to find the places referred to on our websites. This constitutes a legitimate interest within the meaning of GDPR Art. 6, para. 1(f). If you do not agree to this processing of your data, it is possible to deactivate the "Google Maps" service and thereby prevent the transfer of data to Google. To do this, you must deactivate the JavaScript function in your browser. However, we would like to point out that in this case you will not be able to use "Google Maps," or only to a limited extent. The use of "Google Maps" and the information obtained via "Google Maps" is subject to the Google Terms of Use at <https://www.google.de/intl/de/policies/privacy/>.

Google AdWords and DoubleClick

We use Google AdWords Remarketing and DoubleClick by Google, services of Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"), to provide ads based on the use of previously visited websites.

Google uses the so-called DoubleClick cookie, which enables your browser to be recognised when you visit other websites. The information generated by the cookie about your visit to this technology (including your IP address) will be transmitted to and stored by Google on servers in the United States (additional information on transfers of personal data to the United States can be found below under "Transmission of personal data abroad"). Google will utilise this information to evaluate your use of the technology with regard to the ads to be placed, to compile reports on website activities and ads for the website operators, and to provide other services associated with the use of the website and the Internet. Google may also transfer this information to third parties if this is required by law or if third parties process this data on behalf of Google. However, Google will never associate your IP address with other Google data.

Web Analytics

Google Analytics

This website uses Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site.

The information generated by the cookie about your use of this website is usually transferred to a Google server in the USA and stored there. However, if IP anonymisation is activated on this website, Google will shorten your IP address within Member States of the European Union or in other countries which are already party to the European Economic Area Agreement. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will utilise this information to evaluate your use of the website, to compile reports on website activity, and to provide other services to the website operator in connection with website and Internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data. You may prevent the use of cookies by selecting the appropriate settings on your browser, however, we would like to point out that in this case you may not be able to use all functions of these websites to their full extent. You can also prevent Google from collecting the data generated by the cookie and relating to your use of the website (including your IP address) and from processing this data by Google by clicking on the link below. Further information regarding the use of data for advertising purposes by Google as well as setting and objection possibilities can be found on Google websites:

<https://www.google.com/intl/de/policies/privacy/partners> ("How Google uses information from sites or apps that use our services"), <http://www.google.com/policies/technologies/ads> ("Advertising"), <http://www.google.de/settings/ads> ("You can control the information Google uses to show you ads") and <http://www.google.com/ads/preferences> ("Ad personalization").

Google Analytics Remarketing

Our websites use the functions of Google Analytics Remarketing in connection with the cross-device functions of Google AdWords and Google DoubleClick. The service provider is Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

This function enables the target groups created with Google Analytics Remarketing to be linked with the cross-device functions of Google AdWords and Google DoubleClick. In this way, interest-related, personalised advertising messages that were adapted to you depending on your previous usage and online behaviour on one device (e.g. mobile phone) can also be displayed on another of your devices (e.g. tablet or PC). Once you give your permission, Google will link your web and app browsing history to your Google Account for that purpose. This way, the same personalised advertising messages can be delivered to every device you sign in to with your Google Account. To support this feature, Google Analytics collects Google authenticated user IDs that are temporarily linked to our Google Analytics data to define and create cross-device ad targeting. You can permanently prevent cross-device remarketing/targeting by disabling personalised advertising in your Google Account; follow this link: <https://www.google.com/settings/ads/onweb/>

The summary of the data collected in your Google Account is exclusively based on your consent to Google, which you can grant or revoke (GDPR Art. 6, para. 1(a)). For data collection operations that are not merged into your Google Account (e.g. because you do not have a Google Account or have blocked the merge), the collection of data is based on GDPR Art. 6, para. 1(f). Legitimate interest arises from the fact that the website operator has an interest in the anonymous analysis of website visitors for advertising purposes.

Further information and the data protection regulations can be found in Google's Data Privacy Statement: <https://www.google.com/policies/technologies/ads/>.

Disclosure of data to third parties

We will only pass on your personal data if you have expressly consented, if there is a legal obligation to do so, or if this is necessary for the enforcement of our rights - in particular for the enforcement of claims arising from the relationship between you and SKIREGION. Furthermore, we only pass on your data to third parties insofar as this is necessary for the use of the website, the provision of the services requested by you, and the analysis of your user behaviour.

Transmission of personal data abroad

SKIREGION is entitled to transfer your personal data to third parties (contracted service providers) abroad, provided that the data processing described in this data protection declaration makes it necessary. These companies are bound to data protection to the same extent as we are. If the level of data protection in a country is lower than that in Switzerland or Europe, we contractually ensure that the security of your personal data corresponds at all times to that in Switzerland or the EU.

Data security

Please note that contact with SKIREGION and its partners - for example via the contact form, registration for the newsletter or use of the image database - is made online and is, therefore, an open network accessible to everyone. Although the data between you and the SKIREGION websites is transmitted in encrypted form (encrypted websites), specific transport connection data such as sender and recipient addresses remain unencrypted.

We use appropriate technical and organizational security measures to protect your personal data stored with us against manipulation, partial or complete loss, and against unauthorised access by third parties. This system is continuously improved in keeping with technological developments. Nevertheless, you should always treat your access data to accounts and payment information confidentially and close the browser window when you have finished communicating with us - especially if you share your computer with other users. It is your responsibility to protect your computer and associated equipment adequately.

We also take internal data protection very seriously. Our employees and the service companies commissioned by us have been obliged by us to maintain confidentiality and to comply with all data protection regulations. Notwithstanding, SKIREGION shall not be liable for loss of profit, loss of data or other direct, indirect or consequential damage resulting from access to elements of SKIREGION websites or their use, or the impossibility of accessing or using them, or from links to other websites or technical faults.

Storage of personal data

We store personal data only for as long as it is necessary

- to utilise the tracking, advertising and analysis services mentioned above within the scope of our legitimate interest;
- to carry out services to the extent mentioned above, which you have requested or for which you have given your consent (e.g. the newsletter);
- to comply with our legal obligations.

We keep contractual data for a more extended period, as legal storage obligations prescribe this. The latter results from accounting and tax law regulations. These require that business communications, contracts and accounting records must be kept for up to 10 years (or up to 5 years for users resident in France). If we no longer need this data to perform services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

Your rights

In accordance with the Swiss Data Protection Act and the European General Data Protection Regulation (GDPR), you have specific rights with regard to the processing of your personal data. In particular, these include:

Right of access

You have the right to information about your personal data - free of charge and on request.

Right to rectification and erasure

In addition, you have the right to have incorrect data amended and your personal data deleted. This only applies, however, insofar as there is no legal obligation for us to store the data or there are no legitimate reasons for us to process the data.

Right to restriction of processing

In accordance with Articles 18 and 21 of GDPR, you also have the right to demand a restriction of data processing or to object to it.

Right to object

You can object to the processing of your personal data at any time. Please send a message to the following address: info@daenk.ch

Right to complain

You have the right to complain to the competent data protection supervisory authority about the processing of your personal data by SKIREGION at any time.

Contact

Do you have any questions about this privacy policy? Would you like to exercise your data protection rights such as the right to information about your personal data, the right to rectification, or the right to erasure?

If so, then contact us at:

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Badstrasse 1
CH-3775 Lenk
T. +41 (0)33 736 30 30
info@daenk.ch
www.adelboden-lenk.ch

Revised: 30.08.2018