



PRIVACY POLICY FOR MOUNTAINCARTS RENTAL CUSTOMERS

PLOSE SKI S.p.A. with registered office in Bressanone (BZ), via della Funivia no. 17, in the person of its legal representative pro tempore, Ms. RUHNKE KAREN, VAT number and registration number in the Register of the Chamber of Commerce of Bolzano IT00125950212 - REA no. BZ-54080 (hereinafter "**PLOSE**" or the "**Controller**") is constantly committed to protecting the online and offline privacy of its customers.

This document has been prepared pursuant to Article 13 of EU Regulation 2016/679 (hereinafter: "**Regulation**"), as well as pursuant to Legislative Decree 196/2003 as amended by Legislative Decree 101/18 (hereinafter, together with the Regulation, the "**Applicable Legislation**") in order to allow you to be informed of our privacy policy, to understand how your personal information is handled in the context of the activities aimed at the rental of Mountain Karts (hereinafter: "**Equipment**"), at our offices or on the institutional website (hereinafter: "**Site**") and, where applicable, to give your express and informed consent to the processing of your Personal Data. The information and data provided by you or otherwise acquired as part of the use of the Site for the rental of the Equipment, such as: access to the reserved area of the Site, as well as the sending of updated information on activities and promotions, including co-marketing, newsletters, etc. (hereinafter, collectively: "**Services**") will be processed in compliance with the provisions of the Applicable Legislation and the obligations of confidentiality that inspire the activity of PLOSE.

Accordance to the rules of the Regulation, the data processing carried out by the Data Controller are based on the principles of lawfulness, fairness, transparency, purpose limitation and conservation, data minimization, accuracy, integrity and confidentiality.

TABLE OF CONTENTS

1. **Data Controller**
2. **Personal Data subject to processing**
3. **Purposes of data processing, lawful basis and retention periods**
4. **Disclosure of Personal Data**
5. **Transfer of Personal Data**
6. **Absence of automated decision-making processes**
7. **Your rights**
8. **Amendments**

1. **Data Controller**

The Data Controller of the processing carried out within the framework of the Equipment rental/maintenance activities, off-line and on-line, through the Site is PLOSE SKI S.p.A. as defined above. For any information regarding the processing of Personal Data by the Data Controller, including the list of Data Processors, please write to the following address: info@plose.org.

2. **Personal Data subject to processing**

The Data Controller collects, through traditional and online channels, only the following category of common data according to the purposes pursued, and as better specified in this policy: personal and contact data; rental data (hereinafter "**Personal Data**").

3. **Purposes of data processing, lawful basis and retention periods**

The processing we intend to carry out, with your specific consent where necessary, has the following purposes:

- a. Rental of the Equipment;
- b. Administrative, accounting and legal purposes related to the Services;
- c. Ascertaining, exercising, or defending rights of the Data Controller in case of complaints, termination, litigation;
- d. Soft spam and newsletters to send commercial communications with automated (e.g. sms, email, push notifications and instant messaging) and traditional (e.g. telephone calls with operator and traditional mail) contact methods. The sending of commercial communications may also take place through online channels (e.g. popups through the Site). Commercial communications may only concern Services similar to those that are the subject of the pre-existing relationship, with respect to which you have already expressed your interest. Obviously, you may object to the aforesaid processing at any time, by writing to the Data Controller at: info@plose.org, or by means of the "opt-out" option exercisable by clicking on the relevant link present in every automated communication.

The lawful basis for the processing of Personal Data for the purpose referred to in section 3 (a.) is art. 6(1)(b) of the Regulation (performance of a contract) as the data is necessary to provide the Services required and/or to respond to requests from the interested party. Your Personal Data will be retained for the entire duration of the Services, unless they have to be retained for further purposes and, after termination, for 10 years, unless different retention periods are provided for by law or sector regulations.

Instead, for the purpose referred to in section 3 (b.), the legal basis for the processing is the need to fulfil a legal obligation (art. 6.1 letter c Regulation). Your Personal Data will be kept for the period provided for by the Applicable Legislation. For all the aforementioned purposes, the provision of your Personal Data is optional, but your refusal will preclude the provision of the Services, as well as the fulfilment of legal obligations.

Moreover, for the purpose referred to in section 3 (c.) the legal basis of the processing is legitimate interest (art. 6.1 letter f Regulation). Your Personal Data will be retained for the entire duration of the complaint and/or extrajudicial and/or judicial proceedings, until the exhaustion of the time limits to exercise judicial protection and/or appeal actions.

Finally, for the purpose referred to in section 3 (d.) the legal basis of the processing is legitimate interest (art. 6.1 letter f Regulation).

Further information on the data retention period and the criteria used to determine this period may be requested by writing to the following address: info@plose.org.

4. Disclosure of Personal Data

Your Personal Data may be shared, for the aforementioned purposes, with:

- Our employees, subject to designation as Authorised Person (a person acting under the authority of the Data Controller), System Administrator, provided that they are previously and adequately instructed to do so by the Data Controller.
- External subjects who perform functions closely connected or instrumental to the Controller's activity, as autonomous data controllers, joint data controllers or data processors, which should be considered essential for the performance of the Services.
- Credit card companies and service providers for anti-fraud control related to the payment process and (where necessary) activation of the anti-fraud control procedure.
- Third parties such as consultants and public authorities that PLOSE may/must contact to enforce or apply the contract relating to the Services.
- Third parties such as police and national authorities to protect our rights, property or the safety of you, your staff and our assets.
- Public authorities and law enforcement agencies, such as customs and immigration authorities, following a valid request.
- Subjects who carry out, in total autonomy, as separate data controllers, or as data processors appointed for this purpose by the Data Controller, purposes ancillary to the activities and the services,

such as business partners, companies offering IT infrastructures and IT assistance and consultancy services, as well as the design and creation of software and websites, or services useful to customise and optimize the services.

The possible or necessary communication of your Personal Data will take place in full compliance with the Applicable Legislation and with the technical and organisational measures taken by the Data Controller to ensure an adequate level of security.

5. Transfer of Personal Data

Your Personal Data are not shared with recipients located outside the European Economic Area. However, the Controller ensures that, should a transfer outside the EU occur in the future, your Personal Data will be processed by these recipients in accordance with the Regulation. Indeed, transfers will be based on an adequacy decision, the Standard Contractual Clauses approved by the European Commission or another appropriate legal basis. More information is available by writing to the following address: info@plose.org.

6. Absence of automated decision-making processes

The Data Controller does not use automated decision-making processes, including profiling as referred to in Article 22(1) and (4) of the Regulation.

7. Rights of data subjects

Pursuant to Art. 15 and following of the Regulation, you have the right to obtain access to your Personal Data at any time. You have the right to request from the Data Controller rectification or erasure of your data, as well as to object to and restrict processing of your data in the cases provided for by Art. 18 of the Regulation. You have the right to obtain the Personal Data concerning you in a structured, commonly used and machine-readable format in compliance with Art. 20 of the Regulation.

Requests must be submitted in written form and sent at: info@plose.org

In any case, you also have the right to lodge a complaint with the competent Supervisory Authority (Italian Data Protection Authority) if you consider that the processing of your Personal Data infringes the applicable law, pursuant to Art. 77 of the Regulation

8. Amendments

The Controller reserves the right to amend or simply update the content of this privacy policy, either partially or entirely, for reasons which may include changes to the Applicable Legislation. You will be informed of any such changes through publication on the Site. Therefore, PLOSE invites you to consult this section regularly in order to familiarize yourself with the most recent and up-to-date version of the privacy policy.

Last updated: April 2024.