



SKISCHULE LECH GmbH & Co KG

Version: 1st of September 2018

Data Protection Information for the Use of Our Online Offers

in accordance with Article 13 of the EU General Data Protection Regulation (GDPR) and Article 96 of the Austrian Telecommunications Laws (TKG)

1 General

The protection and confidentiality of your data is of utmost importance for the Schischule Lech GmbH & Co KG (hereafter referred to as "Schischule Lech" or "we"). In the following, we would therefore like to inform you about the different purposes for which we will process personal data in the course of our online offers, especially regarding our website and our social media channels.

For additional information on how we process personal data, see our Private Policy

<https://www.skischule-lech.com/en/private-policy>

2 Data Processing Regarding the General Use of Our Online Offers

Every time when accessing our website, data and information of the device with which you are accessing our website will be collected. This data and information will be saved in the server's log files. Collected may be (1) the used browser type and version, (2) the operating system of the device accessing the website, (3) the website from which your device has accessed our website (so-called 'referrer'), (4) the sub-websites accessed from our website with your device, (5) the date and time when you have accessed our website, (6) an internet protocol address (IP address), (7) the internet service provider of the accessing system and (8) other similar data and information serving the protection against dangers regarding attacks on our information technology systems. For security reasons, meaning in order to identify attacks on our platforms, we save this data including the IP address for a duration of 14 days. The IP address is afterwards anonymised or the data deleted. The IP address is necessary during the connection to our website in order to transfer its content to your browser. Your data is processed based on our legitimate interests in accordance with Article 6(1f) of the GDPR in order to assure the functionality and safety of our website.

3 Optimising Search and Recommendation Functionalities

We may also save information regarding your user behaviour on our platforms in order to create statistical models. This helps us to make our platforms user-friendly and especially to optimise the functionality regarding the search and recommendation of suitable job advertisements. For this purpose, we also save your pseudonymised IP address (i.e. it is not possible to identify you personally by the IP address saved for the statistical model) to prevent automated access (bots) to our platforms upon the creation of statistical models. The legal basis is hereby provided in Article 6(1f) of the GDPR and our legitimate interest to guarantee the functionality of the statistical models in order to improve our services. The IP address will be deleted after one year.

4 Data Processing Regarding Online Forms

Application Form

If we provide an application form on our platform for job advertisements published on our platforms and you fill in this form and click the button to send your application, your data entered in this application form will be forwarded to us. The legal basis for this data processing is provided in Article 6(1b) of the GDPR which authorizes the performance of pre-contractual measures based on the request of the person concerned.



Newsletter

If you subscribe to a newsletter, we will use your e-mail address for sending the respective newsletter in order to inform you about interesting topics on a regular basis. To guarantee the proper subscription to the newsletter, meaning to prevent unauthorized subscriptions on behalf of third parties, we rely on a 'double opt-in' process and therefore will send you a confirmation e-mail after your initial subscription to the newsletter, asking you to confirm your registration. The legal basis is provided with your consent in accordance with Article 6(1a) of the GDPR.

We save your e-mail address to send you the newsletter until you unsubscribe to the newsletter or until we stop sending the newsletter to you. You may, at any time, object to the sending of all types of newsletters from the Schischule Lech.

In connection with your subscription to the newsletter, we also save your IP address as well as the date and time of your subscription and the confirmation in order to retrace and prove your subscription later on. The legal basis for saving this data is our legitimate interest for proving your subscription in accordance with Article 6(1f) of the GDPR. For a statistical analysis of our newsletter campaigns, the newsletters receive so-called tracking pixels. These are miniature graphics embedded in the HTML formatted e-mail with which we can tell whether and when you have opened our e-mail and on which links available in the e-mail you have clicked. At the same time, your IP address will also be transferred to our servers. However, we do not save your IP address or any other personal data. The legal basis for the use of tracking pixels is our legitimate interest in accordance with Article 6(1f) of the GDPR. Our legitimate interest is based on the analysis and improvement of our newsletter.

Objecting the Use of Personal Data for Advertising Purposes

In case we receive your objection to the use of your personal data for advertising purposes, we will add your personal contact data (name, address, telephone number, fax number, e-mail address) to a blacklist. This list assures that you will not receive undesired advertisement in the future.

Contact Form and E-Mail Contact

On our platforms contact forms are available that may be used for contacting us electronically. By clicking the 'Send' button you agree to send us the data entered in the input mask. Additionally, we save the date and time of you contacting us. Alternatively, you can also contact us via the e-mail address provided. In this case, the personal data of the user sent with the e-mail and our answer will be saved. This voluntarily submitted personal data serves the processing of your request and the establishing of contact with you. The communication ends as soon as it is evident that the request has been conclusively dealt with.

Surveys of the Ski School Lech

From time to time we organise market research surveys. In the course of these surveys we do not collect any personal data. We may however offer the possibility to participate in a lottery at the end of the survey. To participate in the lottery you need to indicate your e-mail address. This information will solely be used for the purpose of the lottery to inform you in case you have won a prize. In particular, we will save your e-mail address entirely independently from your survey answers.

5 Data Retention Period

We only keep your data as long as we consider it reasonably necessary in order to achieve the purposes stated above and as long as permitted by applicable law. In any case, we will save your data as long as the retention periods of the legislator demand or as long as limitation periods of potential legal claims have not yet expired.

6 Involving Data Processors for Hosting, Platform Security, Administration, Debugging and Support Services

For performing our services, we make use of the data processors in the following areas:



Hosting

For hosting purposes of our platform and back-up services we use data processors, so personal data saved on our platforms will be transferred to these data processors. These data processors will save personal data for as long as the data will be saved on our platforms according to the purposes defined in this Private Policy. All data will be processed within the European Union.

Sending E-Mails and Other Messages

Within the scope of order processing we use the service **MailChimp**, offered by the Rocket Science Group, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA, for the sending of e-mails and messages via other electronic channels. This service is certified by the EU-US Privacy Shield and hence guarantees to comply with the European data protection law.

Proxy Caching and Web Application Firewall

We use **Akamai** Technologies GmbH, Parkring 20-22, 85748 Garching, Germany and Akamai Technologies Inc., 150 Broadway, Cambridge, 02142 MA, USA, as order processor for the purpose of proxy caching and web application firewall. Akamai Technologies Inc. is certified by the EU-US Privacy Shield and hence guarantees to comply with the European data protection law.

For the purpose of proxy caching and the web application firewall, every visit to our website will pass through the servers of Akamai, i.e. the user will not be directly connected with our servers, but with the Akamai's servers which then send a request to us and deliver the content to the user. Proxy caching hereby means that Akamai buffers certain content, however no personal data, for a duration of 24 hours, in order to faster deliver it to you. The web application firewall means that Akamai tries to identify harmful web traffic and prevents it from getting to our websites. Akamai does not save personal data. However, any data flow between our servers and the user will pass through Akamai's servers. Therefore, this data flow may also contain personal data.

Google reCAPTCHA

On the basis of our legitimate interest in accordance with Article 6(1f) of the GDPR, namely our interest in the correctness of data, the prevention of automated registration/orders via so-called bots and the economical operation of our online offers, we use in certain cases the service 'reCAPTCHA' of **Google Inc.**, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. The use of reCAPTCHA serves to distinguish whether an input has been made by a human being or abusively by machine processing. The request concerning this matter also includes the transfer of you IP address and, if necessary, other data needed by Google for providing the service reCAPTCHA to Google Inc. For this purpose, your input is transferred to Google and analysed. Google Inc. is certified by the EU-US Privacy Shield and hence guarantees to comply with the European data protection law. For further information regarding Google reCAPTCHA and the Private Policy of Google, see the following links: <https://www.google.com/intl/de/policies/privacy/> and <https://www.google.com/recaptcha/intro/android.html>.

7 Cookies and Similar Technologies

We use cookies on our websites. Cookies are text files which will be stored and saved on a computer system via an internet browser. We use such cookies as technical means for performing services on our platforms as well as for analysing the website behaviour of our visitors in order to present our offers in a user-friendly way. For this purpose, we may also use other technologies, such as tracking pixels or code in apps. Furthermore, we may use these cookies or other technologies in order to provide target-oriented and interesting content for you.

Storage Period of Cookies

Some of the cookies used by us will be deleted after closing the browser session (so-called session cookies). Other cookies remain on your terminal device and enable us or our cooperation partners to recognize your browser on your next visit (persistent cookies). Information on the exact storage



period of a cookie, if not indicated below, can directly be learned from the corresponding cookie by displaying its details in your browser.

Technically Necessary Cookies

We use technical cookies. These are cookies solely necessary to collect certain data on our platforms in order to perform a service requested or desired by you as a user. This includes navigation or session cookies guaranteeing a trouble-free navigation and use of our website; cookies for analysing which are directly inserted by us in order to record collected information regarding the number of visitors and their user behaviour; functional cookies which in the sense of service improvements enable the navigation according to selected criteria (e.g. language selection, purchase of selected products). The legal basis for the use of these cookies is our legitimate interest in accordance with Article 6(1f) of the GDPR, namely pursuing our business purposes.

Cookies and Technologies We Use Via Third-Party Suppliers

In certain areas we additionally use cookies or other technologies provided by external suppliers. In the following, we will inform you about the respective suppliers and how you may object to the corresponding cookies and technologies. In general and with regard to websites you may make the relevant settings in your browser.

Google Marketing Services

On the basis of our legitimate interest in accordance with Article 6(1f) of the GDPR, namely the interest of analysing, improving and economically operating our online offers, we use the marketing and remarketing services of **Google Inc.**, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, ('Google'). Google is certified by the EU-US Privacy Shield and hence guarantees to comply with the European data protection law.

The Google marketing services allow us to more specifically place advertisements on our website in order to only present users advertisements that potentially correspond with their interests. In case advertisements for products are offered a user has been interested in on other websites, this is so-called 'remarketing'. For this purpose, Google will directly upon calling up our website or other websites using Google marketing services execute a Google code and so-called (re)marketing tags (invisible graphics or codes, also referred to as 'web beacons') will be embedded in the website. Thereby, an individual cookie, i.e. a small file will be saved on the user's device (instead of cookies also other similar technologies may be used). The cookies may be inserted by different domains, such as google.com, doubleclick.net, invitemedia.com, admeld.com, googlesyndication.com or googleadservices.com. In this file, it will be recorded which websites the user has visited, which content he/she is interested in and on which offers he/she has clicked. Furthermore, technical information regarding the browser and the operating system, referring websites, time of the visit as well as other information regarding the use of online offers. The IP address of the user will also be recorded. Concerning Google Analytics the IP address will however be shortened within the EU member states or in other contracting member states of the European Economic Area. Only in exceptional cases the entire IP address will be transmitted to a Google server in the USA and shortened there. Your IP address will not be merged with data of the user within other Google offers.

Google may also connect the above-mentioned information with information of other sources. If the user visits other websites afterwards, advertisements according to his/her interests may be displayed. Within Google marketing services, user data will be processed in a pseudonymised way, i.e. Google does not save and process data such as the name or e-mail address of a user, but does process the relevant data with regard to cookies within pseudonymised user profiles. From Google's perspective, the advertisements are not displayed to a concretely identified person, but to the cookie owner independently from who this cookie owner actually is. This is not the case if a user has specifically allowed Google to process his/her data without pseudonymisation. The user data collected by Google marketing services is transferred to Google and saved on Google servers in the USA.

One of the Google marketing services we use is for example the online advertising program 'Google AdWords'. When using Google AdWords every AdWords customer receives another conversion cookie.



Cookies can therefore not be tracked via the websites of AdWords customers. The information collected with the help of these cookies is used for creating conversion statistics for AdWords customers who have decided to use conversion tracking. AdWords customers receive the total number of users who have clicked on an advertisement and who have been forwarded to a website using a conversion tracking tag. They however do not receive any information allowing to identify the user personally.

On the basis of the Google marketing service 'DoubleClick' we may also integrate advertisements of third parties. DoubleClick uses cookies with which Google and its partner websites are able to place advertisements on the basis of the visits of users on these websites or other websites on the internet.

We may also use the 'Google Tag Manager' in order to embed and maintain the Google analysing and marketing services.

For further information on the use of data for marketing purposes by Google, please refer to <https://www.google.com/policies/technologies/ads>. For the Google Private Policy, see <https://www.google.com/policies/privacy>.

If you object the interest-based advertising of Google marketing services, you may use the settings and opt-out possibilities provided by Google: <http://www.google.com/ads/preferences>.

Deactivation, Deletion and Blocking of Cookies

You can change your browser settings to be informed about the insertion of cookies and you may decide whether to accept them in certain cases or if you generally do not accept them. If cookies are not accepted, the functionality of our website may be limited.

8 Online Presence in Social Media

We have online presences in the social networks Facebook, Instagram and Pinterest in order to communicate with customers, interested parties and users of these networks and inform them about our services. All of these networks are either certified by the EU-US Privacy Shield or have their headquarters in the EU and are therefore bound by the rules of the GDPR.

In general, the aforementioned social networks process the data of their users for market research and advertising purposes. It is therefore for example possible to create user profiles based on the user behaviour and their resulting interests. These user profiles may then be used for example to place advertisements within and outside social networks which are supposed to be of the user's interest. For this purpose, cookies are usually saved on the user's computer. These cookies contain the user behaviour and the user's interests. Furthermore, it is also possible that in these user profiles data independently from the user's device in use is saved (especially if the user is a member of the respective platforms and logged on to them).

The use of these social networks and the related processing of personal user data are based on our legitimate interest regarding an effective user information and communication with the user in accordance with Article 6(1f) of the GDPR. In case the users are asked by the respective providers for their consent regarding the data processing (e.g. via activating a checkbox or by clicking a button), the legal basis of this processing is in accordance with Article 6(1a) of the GDPR.

For a detailed description of the respective data processing and the possibilities to object (opt-out), please refer to the linked information on the providers. For raising claims regarding your data subject rights, the most effective way is to directly contact the provider. Only the providers have the respective access to the user data and may directly take action or provide information. If you nevertheless need assistance, please do not hesitate to contact us.



For the respective suppliers, see:

- Facebook (Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland); Private Policy: <https://www.facebook.com/about/privacy/> ; Opt-Out: <https://www.facebook.com/settings?tab=ads> and <http://www.youronlinechoices.com>
- Google (Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA); Private Policy: <https://policies.google.com/privacy> ; Opt-Out: <https://adssettings.google.com/authenticated>
- Instagram (Instagram Inc., 1601 Willow Road, Menlo Park, CA, 94025, USA); Private Policy/Opt-Out: <http://instagram.com/about/legal/privacy/> .
- Twitter (Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA); Private Policy: <https://twitter.com/de/privacy> ; Opt-Out: <https://twitter.com/personalization>
- Pinterest (Pinterest Inc., 635 High Street, Palo Alto, CA, 94301, USA); Private Policy/Opt-Out: <https://about.pinterest.com/de/privacy-policy>

9 Further Information

For further information regarding data processing and particularly your data subject rights, see our Private Policy.

<https://www.skischule-lech.com/datenschutz>

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