

# **Privacy policy and data protection**

This website is operated by Snowsports Westendorf, hereinafter referred to as “we”, “us” and “SSW”, with registered office at Schulgasse 15, 6363 Westendorf, Austria. As Data Controller in accordance with Art. 4 (7) EU GDPR, we describe in this Privacy Policy & Data Protection Declaration the data we collect from you when you visit our website and for which purposes we process such data. In addition, we inform you on how we process data of our customers, suppliers and interested parties for marketing purposes in general and explain in general which rights and safeguards we provide in the course of data processing.

We operate these websites for different reasons, namely: [www.snowsportswestendorf.com](http://www.snowsportswestendorf.com), [www.skischoolwestendorf.com](http://www.skischoolwestendorf.com) .

As the protection of your personal data is very important to us, we strictly adhere to the statutory provisions as set forth in the Data Protection Act and the EU GDPR when collecting and processing your personal data.

In the following, we inform you in detail on the scope and purpose of our data processing as well as your rights as data subject. Therefore, please read our Privacy Policy & Data Protection Declaration thoroughly before you continue using our websites and provide your consent to data processing if applicable.

## **1. What data does SSW process?**

SSW is a platform for snowsport and Snowequipment rental. In principle, you can visit our website without registering and actively providing us with personal data. In this case we only collect the following data:

- File name of the page or file or information you enter (for example, query parameters in the URL);
- File name of the page from which the current page or file was requested;
- Date and time of the request;
- Amount of data transferred;
- Access status (page transferred, page not found, etc.);
- Type and operating system of the web browser used;
- IP address of the client and, if applicable, its domain name or the name of the Internet service provider;
- Statistics on page views, traffic data and advertising data (each via cookies – see below under cookies).

### **Data you enter at SSW:**

Depending on which feature you use which function of the platform, we collect further data that you enter in our platform. You are not obliged to provide the information; without this data, however, you might not be able to use the relevant function. We inform you about data that we collect in connection with your use of the platform here.

As a user of contact forms: Title, first and last name, address, e-mail address and telephone number and other contact details.

As a subscriber to newsletters and mailings: e-mail address and, if given by registration as a provider, first and last name for the salutation, further data such as postal code for playing

local offers, as well as further personalisation based on consumer behaviour (e.g. search history, advertisement content); In order to be able to design our newsletter optimally according to your interests and wishes, the clicks on the links in the e-mail newsletter are registered and stored.

As a participant of raffles in the context of online surveys: We record salutation, first and last name and e-mail address for the purpose of the raffle.

As a participant of user tests, recruited via online surveys: We record salutation, first and last name and e-mail address for the purpose of contacting.

## **2. For what purposes and on what legal basis does SSW process your data?**

We process your data mainly in order to make the offer and the associated services and functions available to you. In addition, some further processing takes place for further purposes, which we describe below together with the respective legal bases. Among other things, we use various methods on the platform for analyzing usage and for playing out online advertising (both also using cookies). In addition, we process data for the purposes of direct advertising by e-mail and for security and prosecution purposes. We process your data in order to make the offer and the associated services and functions available to you. When using the contact form within the advertisements on our platform, the contact information entered by the interested parties is transmitted to the advertisers.

### **2.1 Statistical evaluations and demand-oriented design (Cookies)**

When using our offer, we create usage profiles using pseudonyms for the purposes of statistical evaluation and the demand-oriented design of the offer. These processes are carried out on the basis of legal regulations which allow personal data to be processed because AutoScout24 has a predominant legitimate interest in a needs-oriented design geared to usage habits and the statistical evaluation of our offer (Art. 6 Para. 1 f) DSGVO).

For this we use so-called cookies, i.e. alphanumeric identification characters which we transmit to your computer via your web browser. They allow our systems to temporarily distinguish your browser from others. On the one hand, we send you so-called persistent cookies, with the help of which we write down the application criteria entered by you in our car database and store them for our internal evaluations.

On the other hand, we use so-called session cookies, with the help of which you receive a session ID for the duration of a visit to our pages, which enables us to recognize you as a certain (anonymous) user. This allows us to create continuity for you during your visit and, for example, to avoid that you are repeatedly shown the same advertisements. The session cookie and your session ID will be deleted at the end of your visit to our site.

If you wish to prevent this procedure, you can do so by deactivating the cookie. The help function in the menu bar of most web browsers explains how to set your browser so that it no longer accepts cookies or only accepts cookies to a limited extent. There you will also learn how to configure your browser so that it informs you when a cookie is "offered" to your computer. Unfortunately, you can only fully use and experience the functionality of our website with an activated cookie acceptance.

We therefore recommend that you leave the cookie function of your browser switched on when you visit our pages. We also recommend that you always log out completely after you

have finished using a computer that you share with others and whose browser is set so that the computer accepts cookies. If you do not accept cookies, it is unfortunately not possible for us to provide you with all services and functions of the platform.

For the above-mentioned purposes of statistical evaluation and the demand-oriented design of our offer, we use – unless you have objected – different procedures.

## **Google Analytics**

This website uses Google Analytics, a web analysis service of Google Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyze 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, due to the activation of IP anonymization on these websites, your IP address will previously be reduced by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. This data transmission is based on a corresponding EU-US Privacy Shield certification by Google, which can be viewed at the following address:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>.

On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activities and to provide the website operator with further services associated with website use and Internet use. The IP address transmitted by your browser in the context of Google Analytics is not merged with other Google data.

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 downloading and installing the browser plug-in available under the following link:

<http://tools.google.com/dlpage/gaoptout?hl=en>

For more information on terms of use and data protection, please visit

<http://www.google.com/analytics/terms/de.html> or <https://www.google.de/intl/de/policies/>.

Please note that the code “gat.\_anonymizeIp();” has been added to Google Analytics on this website to ensure anonymous collection of IP addresses (so-called IP masking).

Google Analytics is used on the basis of our legitimate interest in a demand-oriented design, statistical evaluation and efficient advertising of our website and the fact that your legitimate interests do not outweigh (Art. 6 Para. 1 letter f DSGVO).

## **2.2. Online advertising**

The advertising on our websites is optimized for you through the collection and processing of your usage behavior with regard to predicted interests. Cookies are used for this purpose, which are stored on the hard disk of your computer and enable recognition, but do not permit any personal identification of your person.

We collect data about your activities on our website (e.g. clicked advertising banners, visited sub- pages, search queries made, etc.). This data is used by third parties by means of an anonymous user number on behalf of SSW for the purpose of displaying content and advertising in accordance with your interests.

These processes are carried out on the basis of the statutory provisions which allow personal data to be processed because SSW has a predominant legitimate interest in refinancing the investments for the operation of the portal through advertising (Art. 6 Para. 1 f) DSGVO). If you have given us your consent, AutoScout24 will combine the movement data on SSW's websites and mobile apps (pages accessed, content clicked on etc.) and data from other services used on these websites/apps with your registration data in order to be able to show you interesting advertising offers on these websites/these mobile apps (Art. 6 Para. 1 a) DSGVO).

For the delivery of use-based online advertising we use – if you have not objected – different operators of advertising networks.

## **2.2.1. Google**

### **2.2.1.1 AdSense**

We use Google AdSense, an advertising service of Google Inc. (1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA; “**Google**”). Google AdSense uses cookies that enable an analysis of your use of the website and automatic provision of advertisements. Google AdSense also uses “web beacons” (small invisible graphics) to collect information. By using the Web Beacon, simple actions such as visitor traffic can be recorded and collected on the website.

The information generated by the cookie and/or web beacon about your use of this website (including the abbreviated IP address) will be transmitted to and stored by Google on servers in the United States. This data transmission takes place in accordance with applicable data protection law, in particular in compliance with the EU-US Privacy Shield. Google will use this information to evaluate your use of the website with regard to the advertisements, to compile reports on the website activities and advertisements 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. Google will not associate your IP address with any other data held by Google. Third parties will also place cookies on your browser and use the data collected in this way in anonymous form for advertising purposes or to advertise our product. You may refuse the use of cookies by selecting the appropriate settings on your browser (see below); however, please note that if you do this you may not be able to use the full functionality of this website. You can object to the use of your pseudonymous data at any time by installing a browser add-on.

You can download it here: <https://www.google.com/settings/u/0/ads/plugin?hl=en>.

### **2.2.1.2 AdWords**

We have integrated Google AdWords on this website. Google AdWords is an Internet advertising service of Google. Inc. (1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351,

USA; “**Google**”) that allows advertisers to place ads in both Google's search engine results and the Google Advertising Network. Google AdWords allows an advertiser to pre-define certain keywords to display an ad in Google's search engine results only when the user uses the search engine to retrieve a keyword-relevant search result. On the Google Network, ads are distributed to thematically relevant websites using an automatic algorithm and using the previously defined keywords.

The purpose of Google AdWords is to advertise our website by displaying interest-relevant advertising on the websites of third parties and in the search engine results of the Google search engine and by displaying third-party advertising on our website.

If a person concerned reaches our website via a Google ad, a so-called conversion cookie is stored on the information technology system of the person concerned by Google. What cookies are has already been explained above. A conversion cookie loses its validity after thirty days and is not used to identify the person concerned. If the cookie has not yet expired, the conversion cookie is used to determine whether certain sub-pages, such as the shopping basket of an online shop system, have been called up on our website. The conversion cookie enables both us and Google to track whether a person who has accessed our website via an AdWords ad has generated revenue, i.e. has completed or cancelled a purchase of goods.

The data and information collected through the use of the conversion cookie is used by Google to generate visit statistics for our website. We use these visit statistics to determine the total number of users who have been referred to us via AdWords ads, i.e. to determine the success or failure of the respective AdWords ad and to optimize our AdWords ads for the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify the person concerned.

The conversion cookie is used to store personal information, such as the websites visited by the person concerned. Personal data, including the IP address of the Internet connection used by the person concerned, is therefore transferred to Google in the United States of America each time he or she visits our Internet pages. This personal data is stored by Google in the United States of America. Google may disclose personal data collected through the technical process to third parties.

The person concerned can prevent the setting of cookies by our website at any time, as already described above, by means of an appropriate setting of the Internet browser used and thus permanently object to the setting of cookies. Such a setting of the Internet browser used would also prevent Google from setting a conversion cookie on the information technology system of the person concerned. In addition, a cookie already set by Google AdWords can be deleted at any time via the Internet browser or other software programs.

Furthermore, the person concerned has the possibility to object to interest-based advertising by Google. To do this, the person concerned must access the [www.google.de/settings/ads](http://www.google.de/settings/ads) link from each of the Internet browsers they use and make the required settings there.

All information on Google's data protection can be found here <https://www.google.com/intl/de/policies/privacy/>.

You can opt-out here <https://adssettings.google.com/authenticated> and here

<http://www.youronlinechoices.com/de/prferenzmanagement/>. **2.2.2. Other advertising networks**

We also use the services of the following advertising networks:

#### **2.2.2.1. Adform**

We use Adform ApS (Wildersgade 10B, 1 Copenhagen K Copenhagen, 1408 Denmark; "**Adform**"), a service provider that operates a digital advertising platform and operator of a Data Management Platform, which collects and stores information about your activities by setting a cookie to analyze your user behavior, and allows us to create interest based audiences to tailor your ad experience.

For more information about Adform's privacy policy and to "Opt-out" from having cookies stored on your PC when ads are shown from the Adform Ad Serving system

at: <https://site.adform.com/privacy-policy-opt-out/> and <https://site.adform.com/datenschutz-opt-out/>

#### **2.2.2.2. Bing Ads**

Bing Ads (Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399, USA; “**Bing Ads**”) is a search engine advertising tool that displays ads on the search network (websites such as Bing, AOL, Yahoo, other websites owned and operated by Bing or Yahoo, and syndicated search partner sites) and on the content network (within Windows apps or on Windows devices in Bing Smart Search results). Bing Ads Tracking (UET – Universal Event Tracking) makes it possible to track and remarket the paid search. For more information on data protection at Bing Ads, please visit: <https://privacy.microsoft.com/de-de/privacystatement>.

You can find the option of opting out here: <https://account.microsoft.com/privacy/ad-settings/signedout>.

#### **2.2.2.3. DoubleClick**

DoubleClick by Google is a service of Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“**Google**”). Doubleclick by Google uses cookies to deliver advertisements relevant to you. Your browser is assigned a pseudonymous identification number (ID) to check which ads have been displayed in your browser and which ads have been called. The cookies do not contain any personal information. The use of DoubleClick cookies only allows Google and its partner websites to serve ads based on previous visits to our or other websites on the Internet. The information generated by the cookies is transmitted by Google to a server in the USA for analysis and stored there. A transfer of data by Google to third parties only takes place due to

legal regulations or within the scope of order data processing. Under no circumstances will Google match your data with other data collected by Google.

By using our website you agree to the processing of the data collected about you by Google and the aforementioned way of data processing as well as the named purpose. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our website. You can also prevent Google from collecting the data generated by the cookies and relating to your use of the website and from processing this data by Google by downloading and installing the browser plug-in available under the following link under the item DoubleClick deactivation extension.

For more information about Doubleclick by Google’s privacy practices, please visit <https://policies.google.com/privacy/update?hl=en>. You can find the option of opting out at <http://optout.aboutads.info/?c=2#!/>.

#### **2.2.2.4. Facebook**

Pixel: To evaluate and support our online marketing measures on and via Facebook, a so-called “Facebook tracking pixel” is integrated on this website, which is provided by Facebook, Inc. (1601 S. California Ave, Palo Alto, CA 94304 “**Facebook**”, USA). When you visit our platform, the tracking pixel establishes a direct connection between your browser and the Facebook server. Facebook receives information from your browser, among other things, that our website has been called up by your terminal device. If you are a Facebook user, Facebook can associate your visit to our pages with your account. Likewise, Facebook can subsequently recognize whether a Facebook advertisement has had an effect, e.g. has led to an online purchase. We only receive statistical data from Facebook for this purpose without reference to your specific person. This is done for the purposes of advertising effectiveness, market research and demand-oriented design of our website. The tracking with the pixel is

done in a way that does not allow us to identify you as a person and only marks users as visitors to our website in a form that is made anonymous to us. Facebook uses cookies to do this. Facebook stores and uses the information collected using the pixel. This is also done at least in part outside the territorial scope of EU data protection legislation.

**Custom Audience about pixel methods:** A Facebook tracking pixel is integrated on our website. With the help of this pixel, Facebook can track the user's usage behavior on the website. Your usage behavior can be used to create custom audiences in the Facebook Audience Manager website, which you classify according to your usage behavior. These formed website custom audiences can then be used in remarketing or lookalike campaigns. An example of this is that you visit the website to place a particular order but would cancel it. They would then fall into a "drop-out audience" and be addressed again in a Facebook remarketing campaign.

**Audience Network:** To support our online marketing activities, we also use the Audience Network of Facebook, Inc (1601 S. California Ave, Palo Alto, CA 94304, USA; "Facebook"). The Audience Network facilitates the placement of third-party advertising and/or Facebook ads or other commercial or sponsored content ("ads") on our platform as well as in our mobile applications, mobile websites and video players.

If you are a Facebook user, Facebook may use a pixel ID and a Facebook cookie to associate your visit to our pages with your user account. As a Facebook member, you can also edit your account settings at [https://www.facebook.com/ads/website\\_custom\\_audiences/](https://www.facebook.com/ads/website_custom_audiences/) and use them to object to data collection via custom audiences across all devices.

For more information about Facebook's privacy policy, please visit: [https://www.facebook.com/about/privacy/update?ref=old\\_policy](https://www.facebook.com/about/privacy/update?ref=old_policy). You can opt-out here: <https://www.facebook.com/policies/cookies/> and here: <http://www.youronlinechoices.com/de/prferenzmanagement/>.

#### **2.2.2.5. Twitter (MoPub)**

MoPub is the mobile publishing platform of Twitter International Company (One Cumberland Place, Fenian Street, Dublin 2, D02 AX07 Ireland; "Twitter") to promote and monetize

downloadable iOS and Android applications. It is called a "hosted ad serving solution specifically for mobile devices" and enables companies to manage and optimize campaigns, analyze performance reports and metrics, and achieve higher eCPMs through the largest mobile RTB (real-time bidding) exchange. MoPubs SDK (Software Development Kit) was developed especially for the needs of Mobile App Publishers. First-party features support the key campaign management, budgeting, targeting, formatted banners, full-screen, video and native ads functions. The MoPub Marketplace is connected to hundreds of platforms on the demand side (software used to buy advertising through automation), resulting in higher prices for your application inventory. RTB gives you control and visibility over the ads that go into your application, so you can improve your user experience.

Further information on MoPub's data protection can be found here: <https://www.mopub.com/legal/privacy/>.

You can find the option of opting out here: <https://www.mopub.com/optout/>.

#### **2.2.2.6. Mailchimp**

You have the opportunity to subscribe to our newsletter via our website. For this we need your e-mail address and your declaration that you agree with the subscription to the newsletter. Once you have subscribed to the newsletter, we will send you a confirmation

email with a link to confirm the registration. You can cancel the subscription to the newsletter at any time.

We use MailChimp as our marketing automation platform. By submitting the registration form to us, you confirm that the information you provided to MailChimp will be shared for processing in accordance with its Privacy Policy and Terms.

Further information on MailChimp data protection can be found here:

<https://mailchimp.com/legal/privacy/> <https://mailchimp.com/legal/terms/>

### **2.3 Share Buttons**

Our website uses so-called “share buttons”, which are plug-ins from various social networks, namely Facebook, Google+, LinkedIn, Tumblr and Twitter. These share buttons are not used to share information about your visit to our website with the social network operator. Only when you click the respective share button are you directed to the network operator’s page. The operator of the respective social network is responsible for the associated data collection and use. Please refer to the network operator’s privacy policy for details.

### **2.4. Security and protection against misuse**

Ultimately, we use the data of all participants in order to effectively counter any abuse within the scope of our car marketplace in the interest of honest users and to protect our customers from damage in these cases.

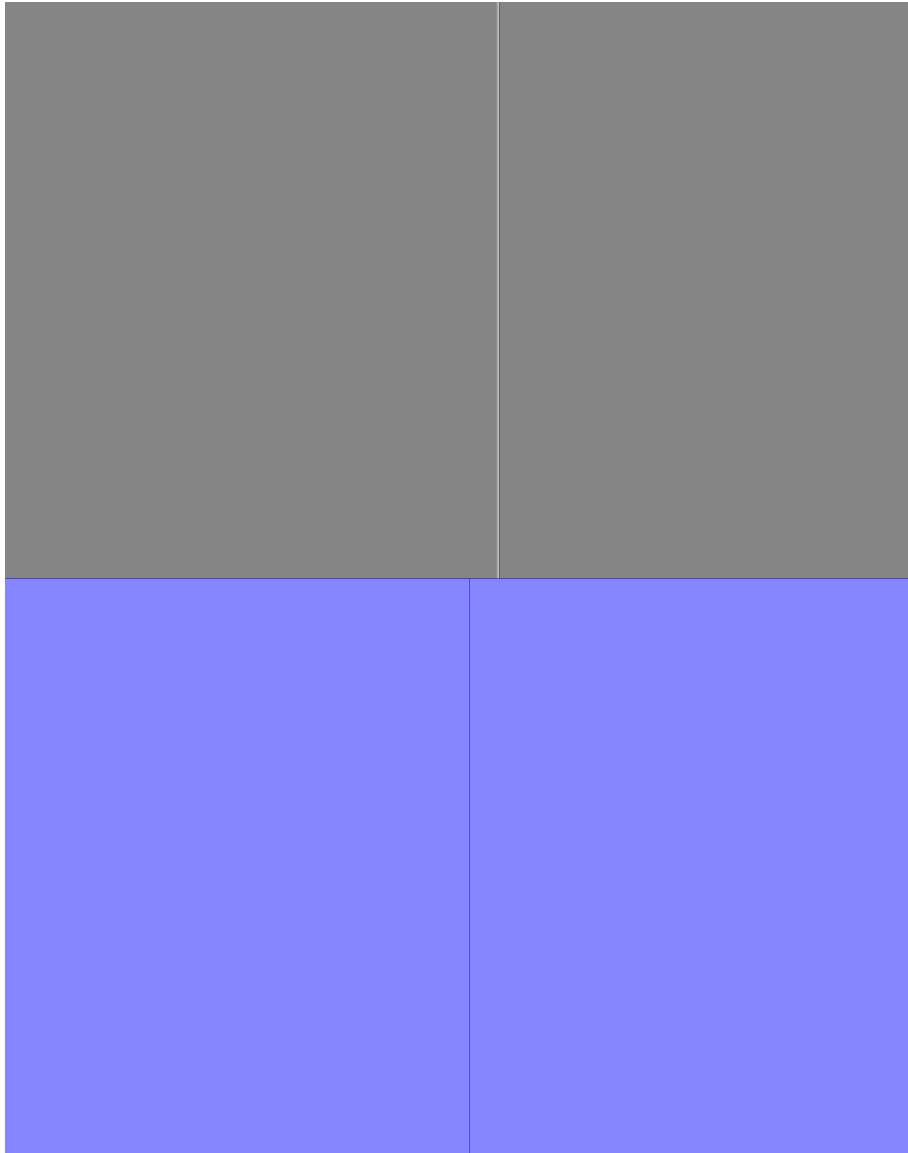
These processes are carried out on the basis of legal regulations which allow us to process personal data for protection against misuse and for legal prosecution and because SSW has a predominant legitimate interest in processing to guarantee the functionality and security of the offer (Art. 6 Paragraph 1 f) DSGVO).

guarantee the operability and security of the offer (Art. 6 para. 1 f) DSGVO).

### **3 To which recipients do we pass on your data?**

It may happen that we also pass on your data to other recipients within the scope of the purposes mentioned in paragraph 2, as they are already named in detail there.





#### **4 How long do we store your data?**

We delete or make your personal data anonymous as soon as they are no longer required for the purposes for which we process them in accordance with the above paragraphs. The actual storage period depends on how you use our offer.

If you have not registered with us, we store your personal data for the duration of use of our offer plus a period of 14 days in which we keep backup copies after deletion, insofar as this data is not required for longer for criminal prosecution or to secure, assert or enforce legal claims.

If you have registered with us, we will store your personal data for the duration of your registration and delete it as soon as you delete your user account. We will keep backup copies of your data for a period of 14 days, until such backups are finally deleted.

In the event that you have given us your consent to the processing of your data (e.g. for the purpose of advertising use including the associated profiling), we will store your data until you revoke your consent.

If we have to store data for legal reasons, the further processing of the data concerned is restricted instead of being deleted.

## **5 What rights do you have as the person concerned?**

As a data subject of the processing of personal data, you have a right to information about the data processed, a right to correction of your personal data, a right to deletion of your personal data, a right to restrict the processing of your personal data and a right to the transferability of your personal data. You also have the right to file a complaint with a supervisory authority.

**In cases where data processing is based on Art. 6 para. 1 lit. e or lit. f DSGVO, or for the purpose of direct advertising, you have the right to object to the processing.**

If you have given us your consent, you can revoke it at any time with effect for the future.

### **5.1 Right of objection**

**You have the right to object to the processing of your data at any time for reasons arising from your particular situation.** We will stop the processing of your personal data after your objection has been raised, unless SSW can prove compelling reasons worthy of protection for the processing which outweigh your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Without prejudice to the above right of objection, **you can also object to the collection and processing of information about the use of the e-mail newsletter at any time.**

Please note that the sending of the newsletter will be terminated with an objection. Please send your objection to newsletters and mailings to: [info@snowsportswestendorf.com](mailto:info@snowsportswestendorf.com)

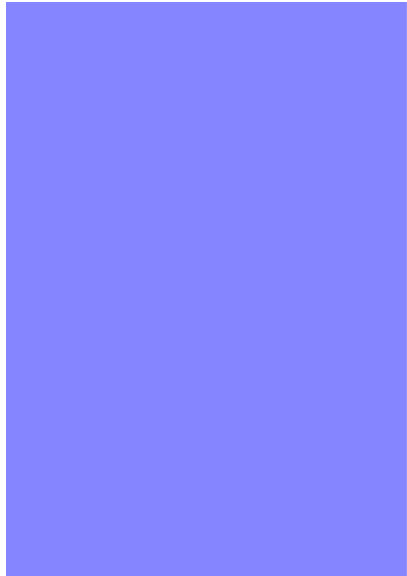
You can also send your objection to newsletters and mailings to the postal address Snowsports Westendorf, Schulgasse 15, 6363 Westendorf, Austria.

### **5.2 Right of revocation**

You can revoke your consent, which you have given us if necessary, at any time with effect for the future, without affecting the legality of the processing carried out on the basis of the consent until revocation. You can send your revocation to Snowsports Westendorf, Schulgasse 15, 6363 Westendorf, Austria., or by e-mail to [info@snowsportswestendorf.com](mailto:info@snowsportswestendorf.com)

### **5.3 Right to correct and complete data**

You have the right to request us to correct any personal data concerning you immediately if it is inaccurate. Furthermore, you have the right to request us to complete your data within the scope



of Art. 16 p. 2 DSGVO – also by means of an additional declaration – if these should be incomplete.

#### **5.4 Right to cancellation (“Right to oblivion”)**

You have the right to request the deletion of your personal data under the conditions described in Art. 17 DSGVO. These conditions provide in particular for a right of cancellation if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed and in cases of unlawful processing, the existence of an objection or a revocation of consent, the existence of an obligation to delete under Union law or the law of the Member States, SSW 4 or the collection of data in relation to information society services offered pursuant to Art. 8 para. 1 DSGVO.

#### **5.5 Right to limitation of processing**

You have the right to request us to restrict processing in accordance with Art. 18 DSGVO. This right exists in particular if the accuracy of the personal data between the user and AutoScout24 is disputed, for the duration which requires the verification of the accuracy and in the event that the user requires limited processing in the case of an existing right to deletion instead of deletion; furthermore in the event that the data are no longer required for the purposes pursued by SSW but the user needs them for asserting, exercising or defending legal claims and if the successful exercise of an objection between SSW and the user is still disputed.

#### **5.6 Right to information and complaints**

You have the right to request information from us at any time on the personal data processed by SSW concerning you within the scope of Art. 15 DSGVO.

They also have the right to complain to the competent supervisory authority.

#### **5.7 Right to Data Transferability**

If we process data that you have provided to us, you have the right to receive the personal data concerning you in a structured, current and machine-readable format or to transmit this data to another person responsible.

## **6 Changes to this data protection information**

The services offered by SSW may be changed from time to time, in particular to further improve the platform's services and functionalities. Such changes may also affect the use of your personal data. We therefore may change this privacy information from time to time. The current version is available on our website under the heading "Privacy". Please inform yourself regularly about the current status of the data protection information.