



Skiarea Valchiavenna S.p.A.

Via per Motta n. 6 23024 MADESIMO (SO)

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EU Regulation n. 2016/679 GDPR regarding the protection of personal data

PERSONAL DATA AND PHOTOGRAPHS REQUIRED FOR RELEASE / MANAGEMENT / CONTROL OF TRANSIT DOCUMENT (SKIPASS) AND CARD RECHARGEABLE

I. Data processing controller

The data controller is **SKIAREA VALCHIAVENNA S.p.A., Via per Motta, 6 – 23024 Madesimo (SO)**

II. Data processing responsible

The data responsible of **SKIAREA VALCHIAVENNA S.p.A.** is the legal representative

III. Purpose for which the data are intended

The personal data are processed within the normal activity of issuing and management of transit documents daily (skipass), multi-day and seasonal and rechargeable card (Valchiavenna card, Open Pass, etc.)

IV. Subject of data processing

The subject of personal data processing are:

- Daily skipass: NONE
- Multi-day skipass (over 3 days): photograph, name, surname, date of birth.
- Seasonal skipass: photograph, name, surname, date of birth, fiscal code, address, phone, email.
- Rechargeable card: photograph, name, surname, date of birth, fiscal code, address, phone, email.

Data can also be detected by an RFID tag, which allows the system to identify the user requesting access using personal data contained on the ski pass without the Users become active in this respect. The personal data being processed will be played on the transit document (skipass). The activation and deactivation of the RFID tag can be made by contacting the Skipass-Office holder.

V. Provision of data

The provision of data necessary to achieve the purposes, including photography if necessary, is mandatory and your refusal to answer about would make it impossible for the Company to fulfill specific legal obligations and consequently to manage relationships with users.

VI. Mode of data processing

In relation to the purposes set up, the processing of personal data, within the law and the privacy obligations, takes place using manual, computerized, ITC, with logic strictly related to the same purposes and, anyway, in order to ensure the security and confidentiality of data themselves (also in the case of use of communication at a distance). The processing of personal data on the skipass can also occur through the use of RFID technologies, taking care to ensure the security and confidentiality. The photograph will be supplied by the Customer, or it can be taken by the operator of the Ticket-Office. Acquired by the information system, the picture is used in the process of issuing / management of the transit document and the purpose of the control of the same document. Captured data is stored by the Holder for a maximum period of two years from the date of issue of the transit document.

VII. Data communications

Your personal data collected for the achievement of those objectives will not be disseminated or disclosed to third parties, unless it is required by law or is necessary to other entities that are directly related to the use of the transit document.

VIII Rights of the person concerned set forth D. Lgs 196/2003 Article 7 and 15 Regulation EU 2016/679 GDPR - Right to access personal data and other rights

Interested parties may exercise all the rights provided by the Article 7 of Legislative Decree 196/2006 and Art. 15 GDPR by contacting the data Controller:

1. The person concerned has the right to obtain confirmation of existence or not of personal data concerning him, even if not yet recorded, and their communication in intelligible form.
2. The person concerned has the right to obtain information:
 - a. about the source of personal data ;
 - b. about the purposes and method of treatment;
 - c. about the logic applied in case with the help of electronic instruments;
 - d. about the identity of the owner, manager and appointed representative according to the Article 5, subparagraph 2;
 - e. about the subject or categories of subject to whom the data may be communicated or who can become aware about them as appointed representative in the State, managers or officers.
3. The person concerned has the right to obtain:
 - a. updating, rectification or, when interested, integration of data;
 - b. cancellation, transformation in anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - c. certification that the operation in letters a) and b) have been notified, also as regards their content, to those to whom the data were communicated or disclosed, except where such compliance is impossible or involves a manifestly disproportionate to the protected right.
4. The person concerned has the right to object, in whole or in part:
 - a. for legitimate reasons, to the processing of personal data concerning it, even for the purpose of collection ;
 - b. to the processing of personal data concerning it for the purpose of sending advertising materials or direct selling or for carrying out market research or commercial communication.

IX. RFID Informative – RFID Skipass “Radio Frequency Identification” can be used by SKIAREA VALCHIAVENNA S.p.A., after the event and acquisition of consent, on the occasion of your access to the structures of Company in order to identify you for the purposes mentioned above. To ensure the privacy of health information, the data written on the skipass is encrypted and they can not be read by outsiders neither it is possible their duplication or breaking.