# **Privacy Statement**

governing the usage of the online booking platform shop.mysuedtirol.info of LTS - Soc. coop.

Versione: 05.06.2020

#### 1 Controller

Protecting your data is particularly important for LTS – Soc. coop. (LTS). When processing your personal data we comply with the applicable provisions of data protection law laid down in the General Data Protection Regulation (GDPR).

The Controller for the purposes of storage and processing of personal data is LTS – Soc. coop., via Conciapelli 60, I-39100 Bolzano.

## 2 Information concerning the processing of your personal data

Upon registration or creation of your personal account, LTS needs to receive the following personal data (hereafter, Master Data) in order to process any potential future contract concluded with you:

- First name
- Last name
- Date of birth
- Telephon number
- Email address
- Street, house number
- Post code, City
- Country

The situations in which personal data are stored and processed are explained below.

#### 2.1 Visiting the website

- Purpose: if our website is only used for information purposes (no registration and no transmission of other
  information), the personal data transmitted by your browser to our server will be collected. This is technically
  necessary in order to display our website and to be able to guarantee the stability and security of the website.
- Legal basis: legitimate interest (point (f) of Article 6(1) GDPR)

The following data are processed: IP address, date and time of request, time zone difference from GMT, content of the request (specific page), access status/HTTP status code, relevant quantity of data transferred, requesting website, browser, operating system and interface, language and version of the browser software

- Duration of storage: as long as you use our website.
- Recipient/categories of recipient: processor(s)

#### 2.2 Electronic enquiries through the website

- Purpose: processing of enquiries sent by email or using the website contact form.
- Legal basis: necessary for the performance of a contract or in order to take steps prior to entering into a contract (point (b) of Article 6(1) GDPR), legitimate interest (point (f) of Article 6(1) GDPR)
- The following personal data are processed: Master Data.
- Duration of storage: until the enquiry has been answered. If any statutory retention requirements apply, processing will be restricted for the duration of the relevant period.
- Recipient/categories of recipient: processor(s)

#### 2.3 Customer management, accounting, legal disputes

- Purpose: processing of personal data in relation to any business relationship with a customer or supplier during
  the course of business along with systematic recording of all business processes relating to revenues and
  expenditure.
- Legal basis: consent (point (a) of Article 6(1) GDPR), necessary for the performance of a contract or in order to take steps prior to entering into a contract (point (b) of Article 6(1) GDPR), compliance with a legal obligation (point (c) of Article 6(1) GDPR), legitimate interest, in particular the establishment, exercise or defence of legal claims (point (f) of Article 6(1) GDPR), express consent (point (a) of Article 9(2) GDPR).
- The following personal data are processed: Master Data
- Duration of storage: until termination of the business relationship or until expiry of the applicable statutory
  retention or limitation periods. In addition, data will be stored until the conclusion of any legal disputes in
  which they are required as evidence.
- Recipient/categories of recipient: organiser, service provider, legal counsel, accountant, tax office, courts and authorities

#### 2.4 Customer support and marketing

- Purpose: processing of the data of existing and prospective customers for the purpose of establishing a
  business relationship with regard to the range of services, the dispatch of additional travel and leisure
  information during the course of the contractual relationship as an additional service, the conduct of marketing
  measures and newsletter dispatch; customer relation management.
- Legal basis: consent (point (a) of Article 6(1) GDPR), necessary for the performance of a contract or in order to take steps prior to entering into a contract (point (b) of Article 6(1) GDPR), compliance with a legal obligation (point (c) of Article 6(1) GDPR), legitimate interest, in particular the establishment, exercise or defence of legal claims (point (f) of Article 6(1) GDPR)

- The following personal data are processed through our website in order to send additional travel and leisure
  information during the course of the contractual relationship as an additional service and in order to send the
  newsletter: Master Data
- Duration of storage: The data are stored until the end of the contractual relationship, unless longer contractual
  or statutory retention periods apply.
- Recipient/categories of recipient: service provider

# 3 Rights of data subjects

#### 3.1 You have the following rights in relation to your personal data:

- right of access (Article 15 GDPR);
- right to rectification (Article 16 GDPR) or erasure (Article 17 GDPR);
- restriction of processing (Article 18 GDPR);
- right to data portability (Article 20 GDPR);
- right to object to processing (Article 21 GDPR).

#### 3.2 Right to withdraw consent

If you have consented to the processing of your personal data by us, you can withdraw your consent at any time. The withdrawal of consent will not affect the lawfulness of processing based on consent prior to withdrawal.

#### 3.3 Right to object

If your personal data is processed on the basis of a balancing of interests (point (f) of Article 6(1) GDPR: legitimate interests), you have the right to object, on grounds relating to your particular situation, at any time to the processing of data. If you exercise your right to object, we will ask you to tell us why we should no longer process your personal data as we have previously been doing. We shall examine the situation and then: stop processing data, change how we process data, or inform you of our compelling legitimate interests and continue data processing. We shall also continue data processing if necessary for the establishment, exercise, or defence of legal claims. You can object at any time to data processing for the purposes of direct marketing and data analysis. Should you do so, we shall stop processing your data

#### 3.4 Exercising your rights

In order to exercise your rights you have to let us know in person, over the telephone, or in writing. Any request should be sent to LTS – Soc. coop., via Conciapelli 60, I-39100 Bolzano, telephone no. +39 0471 326 113. We can only provide you with information if you are able to identify yourself.

#### 3.5 Complaining to the supervisory authority

If you take the view that the storage and processing of your personal data constitutes a breach of applicable data protection law or that your data protection rights have otherwise been breached, you also have the right to lodge a complaint with the supervisory authority. Please submit any complaints to the **Garante per la protezione dei dati personali**, **Piazza Venezia 11**, **I-00187 Roma**.

### 4 Cookies and the integration of third party content

#### 4.1 Cookies

We use so-called "cookies" on our website in order to recognise the same USER in the event of repeated visits to our website. Cookies are small text files that are lodged and stored by your internet browser on your computer. They are used in order to optimise our website and content. They are normally so-called "session cookies", which are erased at the end of your visit. In some cases however, these cookies contain information that enables the USER to be automatically identified during future visits. Recognition is possible on the basis of the IP address stored in the cookies. The information thereby obtained is used in order to optimise our content and to enable our website to be accessed more easily. The USER can prevent cookies from being installed through the appropriate settings on his/her browser. However, please note that, in such an eventuality, the USER may not be able to use all functions of this website in full.

#### 4.2 Google Analytics

LTS uses Google Analytics on this page, a web analysis service of the company Google Inc., hereafter "Google". Google Analytics uses so-called "cookies". These are text files that are stored on the user's computer, which make it possible to analyse how our website is used.

The information generated by these cookies, such as the time, place and frequency of visits to the website, including the IP address, are transmitted to Google and stored at that location.

We use Google Analytics on our website with an IP anonymization function. In such an eventuality, the user's IP address will be abbreviated by Google and thereby anonymised within the Member States of the European Union or in other Contracting States of the Agreement on the European Economic Area. Google uses this information in order to assess how our website is used, to compile reports concerning website activities for us and to provide further services relating to usage of the website and the internet. Google may also where applicable transfer this information to third parties, where required by law or if third parties process these data on behalf of Google

Google states that it will not under any circumstances cross-reference the user's IP address with other data held by Google. The user can prevent cookies from being installed through the appropriate settings on his/her browser software. However, please note that, in such an eventuality, it may not be possible to use all functions of the LTS website to the full.

In addition, in most common browsers Google offers the option of disabling the service, this gives the user more control over which data are collected and processed by Google. Should the user activate this option, no further information concerning website visits will be transmitted to Google Analytics. However, if it is activated, this does not prevent information from being transmitted to us or to any other web analysis service that may be used by us.

# 5 Information concerning the transmission of data to third countries or to international organisations

The data processed by us are not transmitted to recipients in third countries or to international organisations.