

**Information about LTS Data Protection,  
from the Landesverband der Tourismusorganisationen Südtirols (LTS), the regional  
association of tourism organizations in Southern Tyrol,  
for the usage of web sites, including cookies, and TIC-Web, -Widgets and the  
Tourist Manager software, as well as Member Management and Bookkeeping**

**1. LTS**

1.1. **The Landesverband der Tourismusorganisationen Südtirols (LTS)**, Gerbergasse 60, 39100 Bozen, Italy, Tel +39 (0471) 97.80.60, Fax +39 (0471) 97.76.61, e-Mail: info@lts.it, Web: www.lts.it, (hereafter LTS) is the parent association of the tourism associations in Southern Tyrol.

1.2. Among other tools, LTS has developed an Internet-based package for the tourism industry, **TIC-Web**. The respective **tourism organizations in Southern Tyrol (hereafter TOS)** and through them their members can access all of the TIC-Web features through the Internet. This means that TIC-Web can be accessed from any workstation. All of the hotels in Southern Tyrol have been included and managed using the TIC-Web software. TIC-Web also provides support for the daily TOS routines. The scope of TIC-Web's features will be expanded over the course of time. TIC-Web provides the following modules to support the TOSs.

- Management of the master data for hotel and restaurant operations
- Notification of availability
- Inquiry management
- Info.Point 2.0 for 24-hour guest information
- Contacts for press releases
- Weather and snow reports
- Web-cams
- The LTS POI Finder for finding landmarks and activities in Southern Tyrol
- The LTS Event Manager for event management, reservation and ticketing
- The LTS Gastronomy Finder for finding restaurants in Southern Tyrol;
- The LTS Package Finder for managing local offers

Of course, TIC-Web will be quickly adjusted to the growing developments in the tourism and IT fields. Thus, the LTS software development department is continuously working various modules to modify them to the current needs and desires.

Along with the inquiry management system, the management of operational data and maintenance of availability schedules are the primary features of TIC-Web. In addition to these features, a number of others are available such as the Event Manager feature for event management, reservation and ticketing, an independent module for contacting the media, Info-point solutions for providing guests with 24-hour information and an online reservation solution.

- 1.3. LTS also provides pane components, so-called **widgets**, for integration into the third-party web pages, which simplify the integration of data into other web pages. LTS provides the following widgets.
- LTS Hotel Finder
  - LTS Package Finder
  - LTS Restaurant Finder
  - LTS Event Finder
  - LTS POI Finder for cultural events, landmarks and activities
  - LTS Catalog Search
  - LTS Booking Widget
- 1.4. Furthermore, LTS has developed an Internet-based package for the tourism industry for the management of guests, especially the local Austrian Office of Statistics, local taxes and police reporting systems, **LTS Tourist Manager**. Using LTS Tourist Manager, the **respective hotel and restaurant operations (hereafter Operation)** can manage their (potential) guests and their data. In some cases, they can contact the Operation's employees for advice.
- 1.5. TIC-Web, the widgets and LTS Tourist Manager are hosted and maintained by LTS, so that LTS had to be certified as the so-called "order processor" due to the General Data Protection Regulation (Art 4, Paragraph 8 of the GDPR). The respective TOSs, the Operations and the associated web page operators had to be certified as Responsible Parties (Art 4, Paragraph 7 of the GDPR) for reasons of data protection. Correspondingly, the obligations have been distributed according to the GDPR, specifically the respective TOS or the respective company will meet the obligations regarding data protection, in particular the obligation of information and the awareness of the rights of the affected people.
- 1.6. In addition, LTS also provides data processing services as the party responsible for data protection (regarding this see Items 5 and 6). In this regard, the obligations of data protection fall on LTS.
- 1.7. LTS strives to comply with the data protection conditions that are known to You and does not unconditionally provide information or protected data for areas (in particular human resources) so that the object of data protection does not mandatorily include all information with regard to all processing activities.

## **2. Regarding Data Protection**

- 2.1. The Company, the TOSs and the Operations respect and protect the rights for the protection of data and privacy. They will take every measure legally required to protect the personal data of the affected people.
- 2.2. As a consequence, you can quickly and easily get an overview of the personal data that will be processed by you as a member, functionary, promoter, customer, supplier, interested party, guest or Operation or TOS, or employees of such, or as a journalist and so on and the purposes and legal basis for such processing. In this, compliance with any distribution of roles regarding data protection as described in Item 1 between LTS, the TOSs and the companies is mandatory. Furthermore, it will also inform you about your rights related to data protection, the so-called rights of the affected party.

### **3. Data Processing in TIC-Web and the Widgets**

- 3.1. Data entered in TIC-Web for the TOSs by the Operations, service providers and event organizers for the provision of the modules indicated in Item 1.2 and the widgets indicated in Item 1.3, including contact person, information about the Operation or the event organizer's event, including images, amenities, prices and availability, for processing the advertisement of the Operation using the LTS tourism portals and/or third parties (web pages, widgets, info-points and reservation platforms). The legal basis of processing is the respective agreement (Art. 6, Paragraph 1, lit 1 of the GDPR), which may be revoked at any time by the respective TOS or company according to the processes intended for the respective agreements. The revocation may be declared by email sent to LTS at [gdpr@lts.at](mailto:gdpr@lts.at), whereby LTS will immediately transfer the revocation to the respective responsible party. The data will be processed according to the terms of the agreement until such revocation.
- 3.2. To the extent that such data has not been provided, provision of the corresponding services by the respective TOS or companies may not be possible depending on the modules or widgets.
- 3.3. The web pages, informational pages, reservation platforms (recipients according to data protection) where advertisements may be placed may be reviewed using the following link, <https://www.lts.it/index.php/en/9-nicht-kategorisiert/303-platforms-that-apply-the-data>
- 3.4. To the extent that (potential) guests request information through TIC-Web or the widgets, the interests indicated by the entered data, specifically any names, addresses, services and associated documents or correspondence, date of birth, gender, nationality, country of origin, data about the documents, payment known interests, intolerances, handicaps or other health information, reporting information and residency data, will be processed. In some cases, this data can also be used to complete local taxes, registration of the guests with their accommodations (such as reports to police) and the necessary statistics. To the extent that the corresponding data is not provided, the services will not be able to be provided as a rule. The legal basis for processing this data is, on the one hand, the necessity for the fulfillment of the Company's contract with the guest or the execution of the pre-contractual measures that can be revoked by the guest at any time upon request (Art. 6, Paragraph 1, lit. b of the GDPR) or, in particular with regard to any potential health information, the respective (express) agreement (Art. 6, Paragraph 1, lit. a of the GDPR and Art. 9, Paragraph 2, lit. a of the GDPR) by the respective TOS or company.. The contractual data will be processed until the contractual purpose has been completed and for legal obligations of storage, in particular in accordance with tax and/or commercial law or with regard to the legal basis of the agreement until the point of revocation.
- 3.5. Contacts with the media, specifically names, contact information and contact method, will be processed by TIC-Web. The legal basis is the justified interest, specifically the promotion of tourism and information to the public through the TIC-Web activities of the respective TOS or company., which do not supersede the interests of the journalists (Art. 6, Paragraph 1, lit f of the GDPR). See Item 7.6 below regarding the right of revocation. The data will continue to be processed until the purpose has been achieved or until revocation.
- 3.6. Interested people can subscribe to the newsletters for the respective TOS and company by supplying their data, in particular using the widgets, and issue their agreement (Art. 6, Paragraph 1, lit. a of the GDPR) and communicate through the corresponding newsletters or messages (in particular electronic mail) using informational and/or advertising materials about new products, services and events that will be communicated through TIC-Web and the widgets for the respective TOS and company or be informed about such current events. Any transmission history and erroneous transmission as part of the transmission of the

newsletters will be processed in the following areas. Provision of the data by the interested parties is required and the corresponding newsletters cannot be sent or received if the data is not provided. A process will also notify the interested parties about the potential revocation notices to the respective TOS or company by a process as part of the agreement, whereby a link or information will be contained in each newsletter about unsubscribing. The data about the revocation will be stored.

- 3.7. In some cases, LTS collaborates with IT service providers located in the European economic area for the technical operation of TIC-Web and the widgets, who will receive access to the data indicated above under some circumstances. LTS has concluded the (sub-contracted data processor )-agreements necessary for data protection so that the data indicated above will only be processed in a legal and secure manner.

#### **4. Data Processing in the LTS Tourist Manager**

- 4.1. In particular, LTS Tourist Manager manages and processes the data of the Operation's (potential) guests, specifically names, addresses, services used including billing and accounting data (also for reporting to the SDI - sistema di interscambio - of the Agenzia delle Entrate), documents and correspondence associated with such services, gender, nationality, country of origin, document data, bookkeeping and payment figures, indicated interests and indicated intolerances, handicaps and other health-related information and information related to registration and stay at accommodations. In some cases, the Operation's employees will be entrusted with data, specifically their names and support. Using this information, the Company can complete the services for local taxes, registration of the guests with their accommodations (such as reports to police) and the necessary statistics. To the extent that the corresponding data is not provided, the Operations will not be able to provide the services as a rule.
- 4.2. The legal basis for processing this data is, on the one hand, the necessity for the fulfillment of the Operation's contract with the guest or the execution of the pre-contractual measures that can be revoked by the guest or the agreements with the Operation's employees at any time upon request to the company (Art. 6, Paragraph 1, lit. b of the GDPR) or, in particular with regard to any potential health information, the respective (express) agreement (Art. 6, Paragraph 1, lit. a of the GDPR and Art. 9, Paragraph 2, lit. a of the GDPR). The contractual data will be processed until the contractual purpose has been completed and for legal obligations of storage, in particular in accordance with tax and/or commercial law (thus the processing of billing and accounting data also takes place on the legal basis of Art. 6 para. 1 lit. c GDPR) or with regard to the legal basis of the agreement until the point of revocation.
- 4.3. In some cases, LTS collaborates with IT service providers located in the European economic area for the technical operation of LTS Tourist Manager, who will receive access to the data indicated above under some circumstances. LTS has concluded the (sub-contracted data processor)-agreements necessary for data protection so that the data indicated above will only be processed in a legal and secure manner. In some cases, the respective Operation collaborates with other contracted processing services for the provision of services to the guest. The respective information from the respective Operation must be taken into consideration in that regard, which will provide information about the name and the contact data for the responsible party's data protection officer and in special cases in connection with data processing by the responsible party.
- 4.4. If the Operation changes their data in LTS Tourist Manager and has agreed to update the information in TIC-Web, the updated data will be imported into TIC-Web (see Item 3 above).

## **5. Data Processing in Connection with the Management of the Members and Bookkeeping**

- 5.1. As the party responsible for data protection, LTS processes the data provided by the members, functionaries, and promoters for management of the members, as evidence of contributions, transactions with the members or sponsorship by public and private corporations, in particular associations and personal associations, including text documents that have been created automatically and stored (such as correspondence) regarding these matters. The legal basis for this is membership in the association and the statutes in the sense of Art 6, Paragraph 1 lit b of the GDPR and the Austrian Civil Code (Codice Civile) in the sense of Art 6, Paragraph 1 lit c of the GDPR. Provision of the personal data is required so that provision of the data is a requirement of membership.
- 5.2. As the party responsible for data protection, LTS processes the following personal data in connection with the bookkeeping, including automatically created and stored text documents regarding these matters: the responsible party's customers or suppliers (recipients and providers of goods or services), experts or the contact person for the responsible parties, third parties who collaborate in business transactions, contact people for customers, suppliers or third parties who collaborate in business transactions, naked address information for shippers, suppliers and invoicing and similar, investors and shareholders. This information is kept under the framework of the legal obligations (Art 6, Paragraph 1 lit c of the GDPR), in particular in accordance with bookkeeping and tax law. Provision of the personal data is required so that provision of the data is a requirement for the fulfillment of the contracts.
- 5.3. LTS will delete this data upon expiration of the purposes indicated above if there are no other legal rights of retention.
  - In principle, the data will be deleted after ten years, extending to a longer period if the data is significant for authorities in an associated procedure.
- 5.4. LTS uses the following contracted processing services in this context.
  - HGV, Via del Macello 59, I - 39100 Bolzano
  - PSP Srl., Bastioni maggiori 21, I – 39042 Bressanone

## **6. Usage by the Web Site, including Cookies and Social Media Plug-ins**

- 6.1. Cookies: Our web pages use so-called "cookies". These are small text files that will be saved on your end device with the help of the browser. They do not cause damage. We use cookies to design our offer to be user friendly. Some cookies will remain stored on your end device until you delete them. Those cookies allow us to recognize your browser when you return to visit our site. If you do not want to allow this, you can change the settings in your browser so that you will be notified about the storage of cookies and can allow them on a case-by-case basis. Deactivating cookies may limit the functionality of our web site.
- 6.2. Web-Analysis: Our web pages use Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereafter Google). GOOGLE may be headquartered in the United States of America and therefore there is no general data protection obligation as required by the European Commission, but Google guarantees compliance with European data protection guidelines due to its certification as part of the EU-US Privacy Shield (cf. <https://www.privacyshield.gov/>)

participant?id=a2zt00000001L5AAI), so that suitable and/or appropriate data protection guarantees exist in accordance with Art. 44 and following of the GDPR. Google Analytics uses so-called “cookies” as described in the preceding section. The information generated by the cookies through your usage of these web pages (including your IP address) is transmitted to a Google server in the USA and stored there. Google will use this information for assessing your usage of the web pages, compiling reports about web site activities for web site providers and providing additional services in connection with the usage of web pages and the Internet. Google will also transfer this information to third parties as needed, insofar as such is legally regulated or third parties process this data by contract with Google. In no case will Google place your IP address in connection with other Google data. Through your usage of this web, you declare yourself to be in agreement with the processing of the data collected about you by Google in the manner previously described and for the previously indicated purpose. You may prevent the installation of the cookies through a corresponding setting of your browser software, however, we point out that in this case you cannot use all of the features of these web pages to their full extent under some circumstances. You can prevent the collection of the data and Google’s processing of it by downloading and installing the following plug-in <https://tools.google.com/dlpage/gaoptout?hl=de>. You will find more information about the Google Analytics conditions of use and data protection at <https://www.google.com/analytics/terms/de.html> as well as at <https://support.google.com/analytics/answer/6004245?hl=de>. The page uses Google Analytics by means of IP masking to ensure that the collection of IP address will be anonymous. Please note that we only use Google Analytics to evaluate data from AdWords and the double-click cookie for statistical purposes. If you do not want this, you can disable this feature from <https://adssettings.google.com/?hl=de>.

- 6.3. **GOOGLE FONTS:** Our web pages will use web fonts that have been provided by Google for the uniform representation of fonts. To Google see 6.2. When accessing our pages, your browser will download the required web fonts to your browser’s cache to display the fonts and text correctly. To do this, your browser must open a connection to Google’s servers. Google will then be aware that the web site has been accessed from your IP address. Google web fonts are used in the interest of creating a uniform, attractive appearance. This represents a justified interest according to Art. 6, Paragraph 1 lit. f of the GDPR. You will find additional information at <https://developers.google.com/fonts/faq> and in Google’s data protection declaration at <https://www.google.com/policies/privacy/>.
- 6.4. **SSL and TLS Encryption:** SSL or TSL encryption will be used for reasons of security and for the protection of confidential content, such as the orders or questions that you might send us. You can detect that the current connection is encrypted when “https://” appears on the browser’s address line. Aside from that, you can see that encryption has been enabled by the padlock icon on your browser’s status bar. If SSL or TLS encryption has been enabled, the data transferred to us cannot be read by third parties.
- 6.5. **Contact form:** If you choose to use the contact form to send a question, certain personal information will be needed to respond properly to your requests. The entries for this information on the form have been marked with asterisks (\*) or otherwise indicated as mandatory entries. The provision of additional personal or sensitive data is entirely voluntary on your part. If the personal data that has been indicated by an asterisk or otherwise indicated as mandatory is not provided or is incomplete, your request for service will not be able to be met as a consequence. By sending the form, you are declaring your agreement to the processing of the data. Your data will be processed for managing and responding to your questions.
- 6.6. **Newsletter:** We will only send newsletters with information when we have the recipient’s agreement or legal permission. Our newsletter contains information about the company,

services and offers as well as sales, current events and those that might originate from us or our partners. When and how often the newsletters will be sent will depend on the respective newsletter. We will only send newsletters after subscription. Art. 6, Paragraph 1, Clause b) of the GDPR regulates this issue. Recipient data will be given to the service provider for sending the newsletters, among others. This partnership is regulated according to the GDPR by the order processing contract. Ultimately, personal master data serves to personalize the newsletter. Recipients may revoke transmission at any time directly from the newsletter. The duration of storage will correspond to the duration of the newsletter subscription.

## **7. Information about the Rights of Affected Parties with regard to Data Protection**

- 7.1 Right of Revocation To the extent that processing is based on (express) agreement, the person affected by the data processing has the right to revoke the agreement at any time without affecting the legality of the processing performed based on the agreement up to the point of revocation. Regarding the process, refer to Items 3.1 and 3.4 above.
- 7.2 Right of Information Each person affected by processing the data has the right to demand confirmation from the responsible party regarding whether the responsible party is processing personal data. If that is the case, the affected person has a right to be informed about said personal data (copy of the personal data, that is the object of processing) and about the following information: (a) the purpose of the processing, (b) the categories of personal data that will be processed, (c) the recipients or categories of recipients who will or may receive the personal data, especially recipients in foreign countries or international organizations, (d) the planned period during which the personal data will be stored if possible, or the criteria for determining the period, if not possible, (e) the existence of a right of correction or deletion of the personal data or limitation of processing by the responsible party or a right of complaint against processing, (f) the existence of a right of complaint to an overseeing committee, (g) all information about the source of the data if it is not collected from the affected person, (h) the (non-)existence of automated decision-making, including profiling. The responsible party will make a copy of the personal data that is the object of processing available. The responsible party may demand appropriate compensation on the basis of the administrative expenses for all additional copies requested by the affected person. If the affected person submits the request electronically, the information must be made available in a standard electronic format, if not otherwise specified.
- 7.3 Right of Correction and Deletion The affected person has the right to demand the immediate correction of incorrect personal data affecting them. In consideration of the purposes for processing the data, the affected person has the right to demand the completion of incomplete personal data, even by means of a supplement declaration. Furthermore, the affected person has the right to demand that the responsible party immediately delete personal data affecting them. The responsible party shall be obligated to delete the personal data immediately, if the following reasons do not affect such deletion. (a) The personal data will no longer be used for the purposes for which it was collected or process in any other manner. (b) The affected person has revoked their agreement that is the basis for processing and there are no other legal reasons for processing the data. (c) The affected person has complained against the processing (see the next item below). (d) The personal data has been processed illegally. (e) Deletion of the personal data is required for fulfillment of a legal obligation with which the responsible party must comply. (f) The personal data was acquired as part of a service offer from an information company (agreement by a child). In particular, the right of deletion does not exist if the processing is required for the fulfillment of the responsible party's legal obligations or for the exercise of a duty that is in the public interest or the exercise of public power that has been transferred to

the responsible party and/or for the enforcement, exercise or defense of legal claims.

- 7.4 Right of Limitation of Processing The affected person has the right to demand the limitation of processing from the responsible party, if one of the following prerequisites exists. (a) the correctness of the personal data is disputed by the person affected for a period that allows the responsible party to examine the correctness of the personal data, (b) the processing is illegal and the affected person rejects the deletion of the personal data and instead demands the limitation of the usage of the personal data, (c) the responsible party no longer need the personal data for the purpose of processing, however the affected person requires it for the enforcement, exercise or defense of legal claims or (d) the affected person has submitted a complaint against the processing as long as it has not been determined if the justified grounds of the responsible party supersede those of the affected person. If processing has been limited, such personal data (regardless of its retention) may only be processed with the agreement of the affected person, for the enforcement, exercise or defense of legal claims, for the protection of the rights another natural or legal entity or for reasons of important public interest of the Union or a member state. The responsible party will inform an affected person who has obtained a limitation of processing, before the limitation is released.
- 7.5 Right to Transfer Data If processing is based on an agreement or contract and it will employ automated procedure, the affected person has the right to receive the personal data that they have provided to the responsible party in a structured, popular, electronic format. For the exercise of their right to transfer the data, the affected person must obtain the right that the personal data will be transferred directly from a responsible party to another responsible party, if such is feasible at the technical level.
- 7.6 Right of Complaint The affected person has the right to submit a complaint for reasons that result from their special situation at any time against the processing of the personal data that is required for the exercise of a duty, that is in the public interest or in the exercise of public power, which has been transferred to the responsible party or the exercise of the responsible party's justified interests or is required by a third party. The responsible party will then cease processing the personal data, unless they can prove absolute reasons worthy of protection for processing it, which supersede the interests, rights and freedoms of the affected person or the processing serves the enforcement, exercise or defense of legal claims. If personal data will be processed to operate direct marketing, the affected person has the right to submit complaints at any time against the processing of the personal data for purposes of such advertisement. If the affected person complains about the processing for purposes of direct marketing, the personal data may not be used for this purpose.
- 7.7 Right to Complain to an Overseeing Authority Each affected person has the right to complain to an overseeing authority regardless of any other legal aid for management or courts, in particular in the member country where they reside, where they work or the city of the suspected breach, if the affected person believes that the processing of their personal data is contrary to the legal guidelines. The Italian Data Protection Authority is the "Garante per la protezione dei dati personali".