

PRIVACY NOTICE

(Pursuant to Article 13 of Regulation (EU) 2016/679 concerning the protection of natural persons with regard to the processing of personal data)

We invite you to read this privacy notice, which provides information on the processing of personal data in connection with the operation of our Website www.valgardena.it ("**Website**") and our official WhatsApp channel (together, the "**Chat Channels**"), as well as the use of our Chatbot „D O L O“ ("**Chatbot**"), in accordance with Regulation (EU) 2016/679 ("**GDPR**").

This privacy notice supplements our general privacy notice for visitors to our Website, which contains all information pursuant to Articles 13 and 14 GDPR and is also available on the Website.

For comprehensive information about the processing of your personal data, we also recommend that you consult the general privacy notice.

The Chatbot is made available with the aim of providing users ("**Users**" or "**you**") with quick, accessible and interactive access to information concerning accommodation as well as cultural and leisure offerings in Val Gardena. Any further use for purposes not compatible with this informational purpose is excluded.

1. Controller - Who we are



DOLOMITES Val Gardena S.c.a.r.l.

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info@valgardena.it

processes Users' data as Controller within the meaning of Article 4, No. 7 GDPR.



2. What personal data do we process and how

a) Technical data, system and security logs:

In the course of providing the Chatbot, we collect certain personal data that are technically necessary and the transmission of which is inherent in the use of internet and communications protocols, such as IP addresses, date and time of requests, time zone, browser, language and version of the browser software and the operating system of the end device, and the referrer URL, i.e. the Website from which access occurs. If the Chatbot is provided via our WhatsApp channel, we may also collect the User's phone number and displayed profile name, which we retain for the duration of use and for maintenance purposes.

These are not collected with the intention of being associated with individual Users; however, by their nature they could, through processing and matching with data held by third parties, allow Users to be identified.

b) Dialogue content and other information

Use of the Chatbot, regardless of the Chat channel, also entails the processing of the messages you send and receive. This may include, in particular, information or files you provide or upload about yourself as well as information about your interactions with the Chatbot.

c) Contact details

To respond to enquiries or to handle complaints regarding the Chatbot, we also process contact details provided by Users for that purpose, such as first name, surname, email address and telephone number.

No information relating to your health, religious or political beliefs, or other special categories of personal data is required for the provision and use of the Chatbot. Please do not transmit such data. If you nevertheless share such information via the message window, you expressly consent to processing thereof pursuant to Article 9, paragraph 2, letter a) of the GDPR.

Personal data are processed using IT-based tools, including cookies. Further information on the cookies used for this purpose can be found on our website: <https://www.valgardena.it/en/cookies/>.



3. Legal bases and purposes of the processing of personal data

In relation to the provision and use of the Chatbot, we collect and use your personal data solely for the following purposes and on the following legal bases:

<u>Legal basis</u>	<u>Purposes of processing</u>
<u>Fulfilment of contractual obligations or pre-contractual measures (Article 6, para. 1, letter b) GDPR):</u> when Users use the Chatbot through one of the Chat Channels provided.	a) <u>Provision of the Chatbot via one of our Chat Channels</u> We process Users' personal data, such as technical data, system and usage logs, dialogue content, profile names and phone numbers, to provide the Chatbot via our Chat Channels and to enable its use and the delivery of information. We regularly assess the necessity of retaining such requests and messages and delete the relevant data when they are no longer needed. Users are free to provide their personal data for the above purposes. However, the provision of this data is necessary in order to process requests via the Chatbot and/or to maintain the business relationship with DOLOMITES Val Gardena S.c.a.r.l.. If these data are not provided, we may be unable to process the request or provide our services. b) <u>Management of complaints</u> The Chatbot is able to detect indications of negative feedback or complaints. Relevant dialogue excerpts may—after a preliminary technical relevance check—be forwarded to us in order to be recorded as part of an internal process that includes an individual review, feedback to the complaining User and, where appropriate, further measures. For this purpose, in addition to the dialogue content we also process the contact details provided for contacting the User, as well as, where

	applicable, booking- or order-related information relevant to handling the complaint. Users are free to provide their personal data for the above purposes. However, the provision of this data is necessary in order to process requests via the Chatbot and/or to maintain the business relationship with DOLOMITES Val Gardena S.c.a.r.l.. If these data are not provided, we may be unable to process the request or provide our services.
<u>Legitimate interests (Article 6, para. 1, letter f) GDPR):</u> to ensure the availability, proper operation and security of the Chatbot, to detect and prosecute potential criminal offences, and to pursue other legitimate interests—provided that the protection of our interests or those of third parties does not override the user's fundamental rights and freedoms.	<i>c) <u>Security and maintenance</u></i> We process technical and network data that could indirectly reveal the User's identity in order to ensure a reliable User experience. These data are automatically collected during normal operation of the Chatbot and are processed for technical purposes (including troubleshooting, testing, system maintenance, technical support and reporting) or for statistical and analytical purposes to improve the User experience. The latter are generally processed in aggregated and non-identifiable form for statistical purposes. For example, it may be assessed how often certain functions are used or how much time is typically required for certain requests. These evaluations help us to identify technical weaknesses and to further develop the Chatbot in a targeted manner. <i>d) <u>Quality assurance, content maintenance and reporting</u></i> We use excerpts from the Chatbot's dialogue content to continuously verify the quality of the information provided, maintain content and compile reports to assess and improve our digital offering. For these purposes, the dialogue excerpts are cleansed of personal characteristics—such as phone numbers, profile names or other identifiers traceable to a natural person—or pseudonymised before analysis, in order to prevent the prepared content from being attributed to individual Users. <i>e) <u>Disclosure of dialogue content to affiliated companies</u></i> To improve the Chatbot's content offering, response speed and subject-matter quality, we may share dialogue excerpts via secure technical interfaces with software solutions of affiliated companies in the same tourism region. For these purposes, dialogue excerpts are cleansed of personal characteristics—such as phone numbers, profile names, or other identifiers traceable to a natural person—or pseudonymised before analysis, to prevent attribution of the prepared content to individual Users. The receiving companies use these dialogue excerpts solely to answer the User's enquiry automatically and, where applicable, to evaluate them statistically.
<u>Legal obligations (Article 6, para. 1, letter c) GDPR):</u> to comply with applicable laws and regulations and to respond to requests from competent authorities.	<i>f) <u>Personal data we process to comply with legal obligations</u></i> We process Users' personal data in order to comply with any legal obligations, such as fiscal, administrative and accounting obligations.

g) Use of dialogue content and technical data by SaaS service providers

To operate the Chatbot, we rely on the specialist and technical support of a service provider that processes technical data, aggregated User statistics and dialogue content for the provision of the Chatbot under a contractual arrangement with us (Article 6, para. 1, letter b) GDPR).

In addition, these data are also used by the service provider on its own responsibility to train the algorithms and models underlying the Chatbot, to improve response quality and to enhance system stability (Article 6 para. 1,

letter f) GDPR). For this purpose, the service provider uses pseudonymised, or where possible fully anonymised, dialogue excerpts and usage statistics. The service provider cannot readily infer your identity from these data.

You may object at any time to the transmission of your data to the service provider, unless compelling legitimate grounds prevail.

4. Recipients of data – How and to whom we disclose personal data



Without prejudice to the provision set out in our general privacy notice, we may forward certain dialogue excerpts and contact information for the above purposes to affiliated companies in the tourism region. Each receiving affiliated company processes these data under its own responsibility pursuant to Article 4, no. 7 GDPR and solely for the purpose of responding to your enquiry for quality assurance reasons.

If the Chatbot is used via our WhatsApp channel, your phone number may also be stored and processed for internal service purposes by WhatsApp Ireland Ltd. under its own responsibility. We have no influence over such processing activities. Details can be found in the privacy notice made available by WhatsApp: <https://www.whatsapp.com/legal/privacy-policy-eea>.

5. Transfers of personal data – Where personal data are processed



Management and storage of the personal data processed in connection with the operation of the Chatbot take place within the EU and/or the EEA, on servers managed by DOLOMITES Val Gardena S.c.a.r.l. and/or third-party companies engaged by it. However, as part of individual functional components (e.g. cloud hosting, monitoring or support tools), a transfer of personal data outside the EU or EEA may be required. In such cases, before any transfer we ensure that all appropriate measures and safeguards required by the GDPR and applicable law are duly adopted.

6. Storage period for personal data



We process and store Users' personal data in accordance with our general privacy notice and in any event only for as long as is strictly necessary to achieve the purposes for which they were collected.

In particular:

- Plain-text dialogues: retained for a period necessary to process User enquiries and to deliver information, and generally deleted or anonymised after 72 hours. Where the Chatbot is used via our WhatsApp channel, message texts and the phone number stored with WhatsApp may be retained for up to one year from the creation of the relevant chat. They may be processed for a longer period where circumstances exist that justify an extension of the data storage period. In such cases, the personal data will be deleted or anonymised no later than 30 days after the reason for retention ceases to apply.
- System and security logs: are kept for the period required for stable operation and network security, but generally no longer than 90 days.

After expiry of the above storage periods, the data are deleted from our live and backup systems or anonymised for statistical purposes.

7. Data security – How we protect personal data



We take the protection of our Users' personal data very seriously. For this reason, we continuously adapt organisational, technical and administrative measures to protect Users' personal data against unauthorised access, alteration, disclosure or destruction.

8. Rights of data subjects



As a data subject, the User may exercise his or her rights under the GDPR (Articles 15 to 21), in particular:

- Right to withdraw consent (Article 7 GDPR): to withdraw at any time the consent given for the various processing operations that require it. The lawfulness of the processing of the User's personal data carried out before withdrawal remains unaffected. Withdrawal means that from that moment the personal data will no longer be processed for the purposes to which the withdrawn consent related.
- Right of access (Article 15 GDPR): to obtain confirmation of whether personal data are being processed and, if so, to be informed about the purposes of processing, the categories of personal data processed, the recipients and categories of recipients, the data storage period, etc.
- Right to rectification (Article 16 GDPR): to request the rectification of inaccurate personal data and/or the completion of incomplete personal data.
- Right to erasure (Article 17 GDPR): to obtain the erasure of personal data in the cases and under the conditions laid down by law.
- Right to restriction of processing (Article 18 GDPR): to obtain restriction of processing in the cases and under the conditions laid down by law.
- Right to data portability (Article 20 GDPR): to obtain the portability of personal data, i.e. the transmission of personal data, insofar as technically feasible, from one Controller to another, in the cases and under the conditions laid down by law.
- Right to object (Article 21 GDPR): to object to the processing of personal data on grounds relating to his or her particular situation, or where personal data are processed for the purposes of direct marketing.

You may exercise your rights by sending a request to the Controller at the contact details given above.



If the User considers that the processing concerning him or her infringes the GDPR, he or she has the right to lodge a complaint with the supervisory authority: Garante per la protezione dei dati personali (Italian Data Protection Authority), Piazza Venezia 11, 00187 Rome, <https://www.garanteprivacy.it/>.

9. Use by minors

The Chatbot is intended solely for individuals who are 18 years of age or older. If we become aware that a individual under the age of 18 years is using our Chatbot, we will prevent further use and delete all associated personal data.

If you have reason to believe that a minor has provided personal data to the Chatbot, please contact us immediately at the contact addresses indicated in section 1 (Who we are). We will endeavor to remove the relevant information from our systems without delay.

10. Changes to this privacy notice

We reserve the right to amend this privacy notice in order to adapt it to applicable provisions. The updated privacy notice will be published on our Website.

11. Licences

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