

# Data protection provisions

The following data protection information deals with all processing of personal data by

- Arosa Tourismus, Sports and Congress Centre, 7050 Arosa
- Arosa Bergbahnen AG, Seeblickstrasse 29, 7050
- Lenzerheide Marketing und Support AG, Voa Principala 80, 7078 Lenzerheide
- Lenzerheide Bergbahnen AG, Canols, 7078 Lenzerheide

(hereinafter referred to jointly as "Arosa Lenzerheide").

The following data protection information incorporates not only data processing in connection with the website [www.arosalenzerheide.swiss](http://www.arosalenzerheide.swiss), but also the processing of personal data at counters and sales outlets of Arosa Lenzerheide as well as the Bike Kingdom App.

Arosa Lenzerheide is jointly responsible under data protection law for the data processing referred to below.

These data protection provisions are deemed to be an integral component of the General Terms and Conditions of Business of Arosa Lenzerheide and/or of the special terms and conditions of usage for [arosalenzerheide.swiss](http://arosalenzerheide.swiss) as well as its microsites, apps and social media.

We undertake to handle your personal data in a responsible manner. As a consequence, we believe it goes without saying that we comply with the statutory requirements of the Swiss Federal Act on Data Protection (DSG), the Ordinance to the Federal Act on Data Protection (VDSG), the Telecommunications Act (FMG) and other provisions of Swiss law concerning data protection. We also consider it a matter of course that we meet the statutory requirements of the EU General Data Protection Regulation (GDPR).

In the following, we inform you about how we handle your personal data.

Please note that the information contained below is reviewed and amended from time to time. We therefore recommend that you regularly refer to this data protection declaration.

## 1. Data collection [arosalenzerheide.swiss](http://arosalenzerheide.swiss) (including its microsites)

You can recognize microsites that fall under this data protection declaration by the fact that this data protection provisions are published on the site.

### Scope and purpose of the collection processing and use of personal data

#### When visiting our website

When you visit our website, our servers save every access temporarily in a log file.

The following data are saved by us:

- the IP address of the requesting computer,
- Date and time of access,
- Name and URL of the retrieved data,
- the website from which our domain was accessed,
- the operating system of your computer and the browser used by you,
- the country from which the access to our website is made and
- the name of your Internet access provider.

The collection and processing of these data is generally done in anonymised form without any personal link for the purpose of facilitating the usage of the website (establishment of the connection), to guarantee the system security and stability in the long term and to optimise the Internet services and for internal statistical purposes. The information mentioned above will not be linked to or saved with personal data.

Only in the event of an attack against the network infrastructure of the website or in the event of suspicion of other unauthorised or improper use of the website will the IP address be analysed for clarification and for protection and if applicable used in criminal proceedings for identification and for action under civil and criminal law against the respective users.

Our legitimate interests in data processing pursuant to Art. 6 Par. 1 Letter f of the GDPR is to be found in the purposes described above.

#### **During registration**

The website can be visited without registration. Certain bookings on the website can also be done without registration. However, certain functionalities are only available to registered users.

The following data are collected during registration:

- Title
- First name and surname
- Postal address (street, postcode, town or city)
- Country
- E-mail address
- Telephone number
- Language
- Password

The data in the customer account can be viewed and amended at any time. Finally, the customer can request the complete deletion of the customer account. If you wish to delete the customer account, please send a corresponding request to us for this purpose (cf. "Contact" further below).

The legal basis for the processing of your data for this purpose lies in the performance of a contract pursuant to Art. 6 Para.1 Letter b of the GDPR.

In order to register on our website, you can also register via what are termed social login services instead of the direct registration via the website. This option is only available to registered users of the respective social networks.

On our website, you can register via login applications of Facebook (Facebook Connect) and Google. In order to register, you will be forwarded to the page of Facebook or Google, where you can register your user data. Your Facebook and/or Google profiles and our service and/or our website are thus linked. Through the link, we automatically receive from Facebook Inc. and/or Google Inc. information about you (e.g. name, profile picture, age, gender and friends list as well as all other information that you have declared publicly accessible at Facebook, at Facebook Connect).

In return, Facebook and Google receive from us data about you and your activities on our website that Facebook and Google integrate into your profiles with these providers and process them further, in particular for advertising purposes. You will find further information with regard to the transfer of data to the USA later. Further information on data processing by Facebook in connection with Facebook Connect can be found at <https://de-de.facebook.com/about/privacy/>. Information on data processing by Google can be found at <https://www.google.ch/intl/de/policies/privacy/?fg=1>.

If you log in via Facebook Connect or the Google Sign In, you consent to the data exchange mentioned above between us and Facebook and Google respectively and to the respective data processing. You can revoke this consent at any time by e-mail to the e-mail address given below. You can also declare in the data protection settings of Facebook and Google certain data as non-public so that they cannot be exchanged.

You can also prevent the exchange of data by no longer logging in via Facebook Connect or Google Sign In but registering directly on the website.

Finally, you can prevent the exchange of data by logging out from Facebook or Google before you visit our website.

## **During registrations for events**

On the website, you have the opportunity to register for various events. Different personal data are collected, depending on the event. It is pointed out to you in the log-on screen each time what information must be provided on a mandatory basis and what can be provided on a voluntary basis. The following data are regularly collected:

- First name and surname
- E-mail address
- Postal address
- Date of birth

The legal basis for the processing of your data for this purpose lies in the performance of a contract pursuant to Art. 6 Par.1 Letter b of the GDPR. We also save these data in our central database (cf. below).

## **When booking mountain railway tickets**

You have the possibility of accessing our ticket shop via our website ([arosalenzerheide.litibooking.com](http://arosalenzerheide.litibooking.com)). In order to be able to make a booking in the ticket shop, you have to indicate the following information:

- Buyer's first name and surname
- Skier's first name and surname
- Buyer's e-mail address
- Skier's e-mail address
- Buyer's postal address
- Buyer's telephone number
- IP address
- Billing information: ticket conditions, date, ticket type, etc.
- Payment method and credit card information

The legal basis for the processing of your data for this purpose lies in the performance of a contract pursuant to Art. 6 Par.1 Letter b of the GDPR. With the exception of credit card information, we also save these data in our central database (cf. below).

Please note that the ticket shop is operated with the support and assistance of an application of the company LTI Booking, 1061 Market Street, Floor 4, San Francisco, CA 94103 USA. Your booking data are saved on servers of LTI Booking in the USA (regarding the saving of personal data in the USA please see further below under "Tracking Tools"). LTI Booking is Privacy Shield-certified. Further information on the data processing via the applications of LTI Booking can be found [here](#).

## **When booking accommodation**

Accommodation from third-party service providers can be booked via our website (cf. in this regard Clause 8 of the General Terms and Conditions of Business).

When booking accommodation, the following information is to be provided:

- Title
- First name and surname
- Postal address
- E-mail address
- Telephone number
- Country
- Payment method and credit card information

The legal basis for the processing of your data for this purpose lies in the performance of a contract pursuant to Art. 6 Par.1 Letter b of the GDPR. We need the telephone number so as to be able to contact you quickly in the event of problems in the booking process or in the handling of the booking.

Please note that we forward the data to the respective service provider for them to deal with the booking. The latter will process your data to carry out the booking. The service provider will use the telephone number if it should be necessary, e.g. to coordinate the handover of a key for a holiday flat. However, we will also include your data in our central database and process them for marketing purposes if you have consented to this. You can revoke your consent at any time (cf. "Contact" further below).

## **During the booking of package deals**

Package deals (accommodation and tickets) can be booked via our website.

When booking a package deal, the following information is to be provided:

- Title
- First name and surname
- Address, postcode, town or city
- E-mail address
- Country
- Telephone
- Surname, first name and date of birth of the tour members
- Payment method and credit card information

The legal basis for the processing of your data for this purpose lies in the performance of a contract pursuant to Art. 6 Par.1 Letter b of the GDPR.

Please note that we forward the data above that are relevant for the handling of the booking to the service providers who are involved. They will process your data to carry out the booking. However, we will also include your data in our central database and process them for marketing purposes if you have consented to this. You can revoke your consent at any time (cf. "Contact" further below).

## **Newsletter registration**

In order to receive the newsletter or to use a form to contact us, the following personal data (\*mandatory) is required to be correctly entered:

- Your e-mail address\*
- Title\*
- Language\*
- First name\*
- Surname\*
- What are you interested in

When you register for the newsletter, you explicitly declare your consent to our using your address and personal data for marketing campaigns such as the delivery of our newsletter and/or the mailing of catalogues. You can deregister from all marketing campaigns at any time. The contact information can be found further below under "Contacts". You will also find a deregistration link in all newsletter e-mails.

Furthermore, we are entitled to commission third parties with the technical handling of marketing campaigns and accordingly have the right to provide third parties with your personal details for this purpose. For the mailing of our newsletter, we use the e-mail marketing service Mailchimp from The Rocket Science Group, LLC, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA.

Our newsletter can contain what is referred to as a web beacon (tracking pixel) or similar technical means. A web beacon is an invisible graphic that is 1x1 pixel in size and that is linked to the user ID of the respective newsletter subscriber.

For each newsletter sent, there is information on the address file used, the subject line and the number of newsletters sent. Furthermore, those addresses that have not yet received the newsletter, the address to which it has been mailed and which addresses the mailing has failed, can be viewed. In addition, the introductory rate includes information concerning which addresses have opened the newsletter. And finally the information which addresses have deregistered. We use these data for statistical purposes and to optimise the newsletter with regard to content and structure. This makes it possible to align the information and offers in our newsletter better to the individual interests of the recipients. The web beacon is deleted when you delete the newsletter.

In order to prevent the use of the web beacon in our newsletter, please set your mail program, if this is not already the default setting, so that no HTML is displayed in messages. On the following pages, you will find explanations how you can carry out this setting in the most common e-mail programs.

- Microsoft Outlook
- Mail for Mac ("Load removed content in messages")

## **Cookies**

Among other things, cookies help to make your visit to our website easier, more pleasant and more worthwhile. Cookies are information files that your web browser automatically saves to the hard disk of your computer when you visit our website.

Cookies do not harm the hard disk of your computer, nor do they communicate personal data to us.

We use cookies, for instance, to recognise you as a registered user, without you having to log in again each time. In this case, use does not mean that we receive new personal data about you as an online visitor.

Most internet browsers accept cookies automatically. However, you can set your browser so that no cookies are stored on your computer or that you receive a warning message when a new cookie arrives. Further information on this can be found in the settings option of your browser.

However, the deactivation of cookies can result in you not being able to use all the functions of our portal.

## **Tracking tools**

### *Google Analytics*

For the purpose of configuring our pages in line with requirements and optimising them on a continuous basis, we use Google (Universal) Analytics, a web analysis service of Google Inc. ([www.google.com](http://www.google.com)). In this context, pseudonymised user profiles are created and small text files that are stored on your computer ("cookies") are used. The information generated by the cookie about your use of this website such as

- Browser type/version
- Operating system used
- Referrer URL (the site previously visited)
- Host name of the accessing computer (IP address)
- Time of the server request
- Device

are transferred to servers of Google Inc., a company of the holding company Alphabet Inc, in the USA and stored there. In the process, the IP address is shortened through the activation of the IP anonymisation ("anonymizeIP") on this website before transmission within the member states of the European Union or in other signatory states to the Agreement on the European Economic Area. The anonymised IP address communicated by your browser within the framework of Google Analytics will not be merged with Google's other data. Only in exceptional cases will the full IP address be transferred to a server belonging to Google in the USA and shortened there. In these cases, we ensure through contractual guarantees that Google Inc. complies with a sufficient level of data protection.

The information is used to analyse the use of the website in order to be able to compile reports on the website activities and in order to provider further services associated with the use of the website and the internet for the purpose of market research and configuration of these internet pages in line with requirements. This information may also be transferred to third parties if this is stipulated by law or if third parties process these data under contract. According to Google Inc., the IP address will not be combined under any circumstances with other data relating to the user.

Users can prevent the recording of the data generated by the cookie and relating to the website usage by the respective user (incl. the IP address) to Google and the processing of these data by Google by the user downloading and installing the browser plug-in available under the following link:

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

As an alternative to the browser plug-in, users can click on this link in order to prevent recording by Google Analytics on the website in future. In the process, an opt-out cookie is placed on the user's end device. If the users delete cookies (cf. "cookie" above), the link must be clicked again.

We would like to point out that from the perspective of the European Union, the USA does not have a sufficient level of data protection, partly as a result of the topics referred to in this section. If we have explained in this data protection declaration that recipients of data (such as Google) have their registered office in the USA, we will ensure either through contractual provisions with these companies or by ensuring the certification of these companies under the EU-USA Privacy Shield that your data are protected at our partners with an appropriate level.

#### *Facebook Pixel, Facebook Custom Audiences and Facebook Conversion*

Within our online offer, the so-called "Facebook pixel" of the social network Facebook, which is operated by Facebook Inc, 1 Hacker Way, Menlo Park, CA 94025, USA, or if you are resident in the EU, Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland ("Facebook"), is used.

With the help of the Facebook pixel, Facebook is on the one hand able to determine you as a visitor to our online offer as a target group for the presentation of ads (Facebook ads). Accordingly, we use the Facebook Pixel in order to display the Facebook Ads placed by us only to those Facebook users who have also shown an interest in our online offer or who have certain characteristics (e.g. interests in certain topics or products determined on the basis of the websites visited) that we transmit to Facebook (so-called "Custom Audiences"). With the help of the Facebook pixel, we also want to ensure that our Facebook Ads correspond to the potential interest of the users and do not appear annoying. With the help of the Facebook Pixel, we can further track the effectiveness of Facebook ads for statistical and market research purposes by seeing whether users are redirected to our website after clicking on a Facebook ad (conversion).

- Facebook Privacy Policy

The processing of the data by Facebook is carried out within the framework of the Facebook data usage guidelines. Accordingly, general information on the display of Facebook ads is provided in the Facebook Data Usage Policy. Special information and details about the Facebook pixel and its functionality can be found in the Facebook help area.

- EU-US Privacy Shield

Facebook is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with European data protection law.

- Basis

The use of the Facebook pixel and the storage of "conversion cookies" is based on Art. 6 para. 1 lit. f DSGVO. We have a legitimate interest in the analysis of user behaviour in order to optimise both our website and our advertising.

- Objection

Although we register legitimate interests to use the Facebook Pixel and to store "conversion cookies", we offer you opt-out options. You may opt out of the collection of the Facebook Pixel and use of your information to display Facebook ads. To control what types of ads are displayed to you within Facebook, you can go to the page set up by Facebook and follow the instructions on usage-based advertising settings. The settings are platform-independent, which means they apply to all devices, such as desktop computers or mobile devices. You can also opt-out of the use of cookies for audience measurement and advertising purposes by visiting the Network Advertising Initiative opt-out page and additionally by visiting the U.S. website [aboutads.info](http://aboutads.info) or the European website [youronlinechoices.com](http://youronlinechoices.com).

You will find another opt-out option in our cookie declaration.

## HOTJAR

To improve the user experience on our websites, we use the HOTJAR software (<https://www.hotjar.com>) if you have agreed to the use of cookies in the cookie banner. The provider is Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta, Europe. HOTJAR allows us to measure and evaluate user behavior (mouse movements, clicks, scroll height, etc.) on our websites. For this purpose, HOTJAR sets cookies on users' end devices and may store user data in pseudonymized form (e.g. browser information, operating system, time spent on the page, etc.).

You can prevent this data processing by HOTJAR by either revoking your consent in the cookie banner or clicking on the following link: <https://www.hotjar.com/opt-out>. Please note that the deactivation of Hotjar must be done separately for each browser or terminal device. You can find out more about data protection when data is processed by HOTJAR here: <https://www.hotjar.com/legal/policies/privacy/>

## Google Tag Manager

With Google Tag Manager, marketers can manage site tags through a single interface. The Tag Manager itself, who uses the tags, works without cookies and does not collect personally identifiable information. Tag Manager only triggers other tags, which in turn may collect data. There are appropriate explanations in this privacy policy for these third-party providers. Google Tag Manager does not use this data. If you have opted out or otherwise opted out of cookies, it will be honored for all tracking tags used with Google Tag Manager, so the tool will not change your cookie settings.

Google may ask you for permission to share some product information (such as your account information) with other Google products to enable certain features, such as: For example, to simplify the addition of new Google Ads conversion tracking tags. In addition, Google's developer reviews product usage information from time to time to further optimize the product. However, Google will never share this type of data with other Google products without your consent.

For more information, see the Google terms of service and Google privacy statements for this product.

## Links to our social media presence

On our website, we have integrated links to our social media profiles in the following social networks:

- Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA,
- Instagram Inc., 1601 Willow Road, Menlo Park, California 94025, USA,
- Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA and
- YouTube, a service operated by Google Inc.
- TikTok Information Technologies UK Limited, Aviation House, 125 Kingsway Holborn, London, WC2B 6NH ([Privacy Policy](#))

When you click on the respective symbols of the social networks, you will automatically be forwarded to our profile in the respective network. In order to use the functions of the respective network, you have to log in part to your user account with the respective network.

When you call up a link to one of our social media profiles, a direct connection is established between your browser and the server of the respective social network. The network thus receives the information that you have visited our website with your IP address and have called up the link. If you call up a link to a network whilst you are logged in to your account in the respective network, the content of our site can be linked to your profile in the network, which means that the network can assign your visit to our website directly to your user account. If you wish to prevent this, you should log out before you activate the corresponding links. An allocation is done at any rate if you log in to the respective network after activating the link.

## **2. Data collection outside of the website**

### **General**

Arosa Lenzerheide also procures data about you outside of the website. This can be the case, for instance, if you contact us independently of the website by e-mail or telephone and we have to record data from you to deal with your enquiry (e.g. your e-mail address or telephone number) in order to contact you.

We also record personal data from you if you register on site at our company e.g. for an event or book accommodation. As a general rule, we fundamentally procure the same data as we request for bookings on our website.

Our legal basis for this data processing is the fulfilment of your contact requests and thus a legitimate interests pursuant to Art. 6 Par. 1 Letter f of the GDPR and/or the performance of a contract pursuant to Art. 6 Par. 1 Letter b of the GDPR.

In the case of third-party services (cf. Clause 8 of the General Terms and Conditions of Business), we are only intermediaries and only carry out the bookings on behalf of the service providers. We forward the data to the respective service providers for them to deal with the booking. These service providers are responsible for the further processing of the data under data protection law. Unless otherwise informed, the service providers will process the data for the handling of the booking. In the process, they can also use third parties who process the data on their behalf. Hoteliers, holiday flat and holiday home lessors, camping site operators are also required by law to officially register you and your fellow travellers.

In the case of third-party services, we are not responsible for the data processing of the service providers. However, we will save the booking data and all other data that we collect from you in connection with services in our central database and, providing that you agree, analyse them for marketing purposes (cf. further below).

Sensitive personal data: Depending on the services booked, it may be the case that sensitive personal data have to be collected or you have to provide us with such information on your own initiative. For instance, based on a request for a certain type of meal, it may be possible to deduce your religion. These data will be forwarded to service providers for the correct fulfilment of the contract. By providing us with such information, you explicitly authorise us to use this information pursuant to this provision and to forward it to service providers.

### **Video surveillance**

Some areas of the mountain railways as well as sales points are monitored for the safety of guests and employees. The recordings can be saved for a limited period of time.

## **3. Data collection and processing by the Bike Kingdom app**

### **App-specific data collection and storage**

The app is operated by Arosa Lenzerheide. In addition to the service providers listed below, Arosa Lenzerheide is supported in this by inside labs AG, Via Murschetsg 17, 7032 Laax, Switzerland.

Information is collected every time you use the app (i.e. start a new session). This data is used to make our offer more user-friendly, effective and secure. The following information is collected:

- The app version
- Device specifics (e.g. the type)
- The device network
- The operating system
- Screen information
- The session location (latitude and longitude)
- Your personal IP address

For the purposes described above, we have a legitimate interest in data processing as laid down in Art. 6(1)(f) of the EU General Data Protection Regulation (GDPR).

In addition, after consent has been obtained and a user profile has been set up, further personal information is processed and stored for the provision of the services and the execution of contractual agreements. This information is as follows:

#### Profile

- Your surname and first name (this is also imported into the Arosa Lenzerheide CRM system, see subsection 4 below)\*
- Your e-mail address (this is also imported into the Arosa Lenzerheide CRM system, see subsection 4 below)\*
- Your phone number
- Interests with regard to the app or the app provider's services
- The language of the app\*
- Your date of birth
- Your photo

The information marked with an asterisk (\*) is obligatory. All other information is provided on a voluntary basis.

The legal basis for the processing of your data for this purpose is your registration and thus consent in accordance with Art. 6(1)(a) GDPR. You may withdraw your consent at any time with effect for the future.

#### Transactions within the app shop

- The date
- The monetary volume
- Products and services relating to the order
- Anonymised payment information (the type of payment method and, in the case of credit cards, the last four digits of the card number)

The legal basis for the processing of your data for this purpose is the fulfilment of a contract in accordance with Art. 6(1)(b) GDPR.

#### Gamification information: Active and passive tracking information relating to gamification

This involves cooperation with the partner service Strava (Strava, Inc., 208 Utah Street, San Francisco, CA 94103, USA). After obtaining your consent, geolocation and speed data relating to cycled trails is transferred to us by Strava via an interface. Further information can be found [here](#). Please note that Strava stores and processes your data in the United States.

Once a profile has been created, all the information transferred by Strava is stored on our server infrastructure until we receive an active request to delete the information or we are legally obliged to delete it.

The legal basis for the processing of your data for this purpose is your consent in accordance with Art. 6(1)(a) GDPR. You may withdraw your consent at any time with effect for the future.

#### Analytical tools

- Segment: Segment from [Segment.io](#), Inc. (100 California Street, Suite 700, San Francisco, CA 94111, USA) is a customer data platform that enables standardised data transmission. We use Segment to transfer app interactions to our databases, communication and analytical tools. This is relevant to ensure consistent data quality on all systems. Recorded utilisation data is pseudonymised prior to processing. To this end, IP addresses are shortened after collection and the data is not used to create user profiles based on your personal data. The data is generally transferred to a Segment sever in the US, where it is stored. Segment has explicitly and contractually guaranteed its compliance with European data-protection regulations. Further information can be found [here](#).  
The legal basis for the processing of data for this purpose is our overriding legitimate interest under Art. 6(1)(f) GDPR in ensuring data quality. You can object to this data processing at any time.
- Google Analytics: Google Analytics is a web analytics service provided by Google Inc, 1600 Amphitheatre Parkway, Mountain View, CA 94034, USA (“Google”). The app supplies Google Analytics with anonymised events and data via Segment to analyse app usage, improve the quality of the service provided by the app and thus enable a better user experience. The generated information is transferred to a Google server in the US, where it is stored. Through certification in line with the EU-US Privacy Shield, Google guarantees to comply with European

data-protection legislation. Further information on data use by Google can be found [here](#). The legal basis for processing the data for this purpose is our overriding legitimate interest under Art. 6(1)(f) GDPR to optimise the app. You can object to this data processing at any time.

- AppFigures: AppFigures from [Appfigures](#), Inc. (133 Chrystie St. 3rd Fl., New York, NY 10002, USA) is a tool for analysing mobile applications using app stores as well as for app store optimisation (ASO). AppFigures provides app vendors such as us with statistics about the app marketplaces of Apple, Google, etc. in order to better evaluate our app's success. Our app store accounts are linked to AppFigures to analyse app engagement, customer ratings and feedback, and answer questions. This enables us to optimise the app and provide an even better customer experience. Further information can be found [here](#). The data may be transferred to the United States in this context. We contractually ensure that your personal data is adequately protected unless it is transferred anonymously to AppFigures.

If personal data is processed, the legal basis for processing the data for this purpose is our overriding legitimate interest under Art. 6(1)(f) GDPR in optimising the app. You can object to this data processing at any time.

- Braze: Braze from [Braze](#), Inc. (330 West 34th Street, New York, NY 10001, USA) is a comprehensive client engagement platform that enables relevant interactions between clients and brands. Braze functions as a mobile CRM and communication platform. Braze is used to analyse the utilisation of our app and send push notifications to users of our app in a targeted manner. Braze uses a pseudonymised ID to analyse your use of the app. As part of this, data is collected about the version of the operating system you are using, your network provider, the country code, device-related information such as the "Android Advertising ID" and the "advertising identifier for iOS" (to identify users' mobile devices), utilisation behaviour and usage patterns. According to Braze, the information thus obtained is not merged with data on the bearer of the pseudonym. We use this information to send targeted push notifications to app users to provide information about our services or for personalized advertising. The analytics area of Braze also enables the relevance and effectiveness of ad campaigns and communication measures to be analysed and checked so that the insight thus gained can be used to derive more relevant communication strategies that convey relevant information to the right person at the right time. The information generated about your app usage is generally transferred to a Braze server in the US, where it is stored. Braze is Privacy Shield-certified. Further information can be found [here](#).

The legal basis for processing the data for this purpose is your consent to receive push notifications via the app (Art. 6(1)(a) GDPR). If you no longer wish to receive push notifications, you can change the system settings of your mobile device to prevent them being sent. System-related messages are necessary for the functioning of the app. Receipt of these therefore cannot be objected to. The legal basis for these notifications is the fulfilment of the contract pursuant to Art. 6(1)(b) GDPR.

## Platform infrastructure

The app uses specific tools to ensure safe and high-quality operation. All these tools have been selected through a detailed due diligence process because they offer the best possible services in their service category and are global leaders complying with the highest security standards. They are listed below.

### Communication

Braze from [Braze](#), Inc. (330 West 34th Street, New York, NY 10001, USA) is a comprehensive client engagement platform that enables relevant interactions between clients and brands. Braze holds [Privacy Shield certification](#) and has hosted servers at Amazon Web Services. Braze functions as a mobile CRM and communication platform. Braze stores user profiles, which it enriches based on use of the app. This forms the basis for personalised communication via the implemented communication methods, e.g. news feed card, push notification, in-app messaging or e-mail (for additional details on Braze, see above). Further information can be found [here](#).

The legal basis for processing the data for this purpose is your consent to receive push notifications via the app (Art. 6(1)(a) GDPR). If you no longer wish to receive push notifications within the app, you can change the system settings of your mobile device to prevent them being sent.

#### *Payment processing via Saferpay*

The payment provider [Saferpay](#) (SIX Payment Services AG, Hardturmstrasse 201, CH-8021 Zurich, Switzerland) is used for PCI-compliant payment processing. Saferpay stores all information about payment means and transmits only an anonymised token. As a consequence, the app does not store payment information in its pure form at any time. SIX's servers are located in Switzerland. SIX is PCI-DSS-compliant. Further information can be found [here](#).

The legal basis for the processing of your data for this purpose is the fulfilment of a contract in accordance with Art. 6(1)(b) GDPR.

#### *Infrastructure hosting and monitoring on AWS*

The app's infrastructure is hosted on and through the services of [AWS](#) (Amazon Web Services, Inc., 410 Terry Avenue North, Seattle WA 98109, USA). AWS is [Privacy Shield-certified](#) and hosts the database (including personal data) of the Bike Kingdom app. A number of AWS suite services are used here to provide a smooth and scalable standard. The app is hosted on servers in Germany. Further information can be found [here](#).

The legal basis for the processing of data for this purpose is in our overriding legitimate interest in accordance with Art. 6(1)(f) GDPR and in fulfilment of a contract as per Art. 6(1)(b) GDPR because the app cannot be offered without these functionalities.

#### *Performance & function testing via Bugsnag*

[Bugsnag](#) (Bugsnag Inc., 110 Sutter St, Suite 1000, San Francisco, CA 94104, USA) is used to monitor the stability and fault-free operation of the app. Input from Bugsnag can be used to make data-driven decisions about improvements. Bugsnag is a full-stack monitoring solution tailored specially to mobile applications. It analyses crash and bug reports, possibly including user-specific information such as the device or version. If an error occurs, your IP address (in anonymised form), data about your settings and individual aspects of the app page on which the error occurred as well the integrated data is sent to Bugsnag for fault evaluation. Bugsnag Inc. is [Privacy Shield-certified](#). The application is hosted in the United States and Europe (Frankfurt, Germany). Further information can be found [here](#).

The legal basis for the processing of data for this purpose is our overriding legitimate interest in accordance with Art. 6(1)(f) GDPR in ensuring the stability and fault-free operation of the app.

## **4. Data collection and processing by LightRide**

Using the web site lightride-lenzerheide.ch (and the linked site therefore on arosalenzerheide.swiss) as well as by data collection at the cash desk we collect the following data that you can participate the game:

- Name or pseudonym
- E-Mail adress

During the game the following data will be saved that you are able to get your results:

- Chronometry data
- Collected points
- Foto

The legal basis for the processing of data for this purpose is in the fulfilment of a contract as per Art. 6(1)(b) GDPR.

The data will be deleted after 5 years. We reserve to delete the date before that amount of time.

Please note that the game is operated with software from the company race result AG, Joseph-von-Fraunhofer-Strasse 11, 76327 Pfinztal, Germany. Your data will be saved on a server from the company race result AG in Germany.

## **5. General provisions**

### **Saving of your personal data in a central database of Arosa Lenzerheide.**

The personal data mentioned in the previous sections are saved and processed by Arosa Lenzerheide in centralised form. For this purpose, Arosa Lenzerheide works with the Open Source CRM system Pimcore from Pimcore GmbH, Gusswerk Halle 6, Söllheimerstraße 16, AT-5020 Salzburg. The system has been implemented by elements at New Media Solutions GmbH, Gusswerk Halle 6, Söllheimerstraße 16, AT-5020 Salzburg. The company provides support services for the system. The system is hosted on servers of PlusServer GmbH, Welserstrasse 14, 51149 Cologne, in Germany or France.

The data are analysed by us for advertising purposes, in particular in order to be able to offer you personalised services or product information. We also analyse the data in the central database in order to improve our products and services.

User profiles about you can result from these analyses. By using the website functionalities mentioned above, you consent to us being able to save your personal data in our central database and analysing it there for advertising purposes. You are thus agreeing that user profiles about you can result from this. You issue us with your consent to analyse your personal data for advertising purposes and the formation of user profiles. Pursuant to Art. 6 Par. 1 Letter a of the GDPR, this consent constitutes our legal basis for the processing. You can object to the analysis of your personal data for advertising purposes and the formation of user profiles at any time (cf. further below under "Contact").

### **Forwarding of the data to third parties**

We only forward your personal data if you have explicitly given us your consent to this, there is a statutory obligation to do so or if this is necessary to assert our rights, in particular to assert claims arising from the contractual relationship.

In addition, we forward your data to third parties if this is necessary in accordance with the use of the website and the performance of the contract (also outside of the website), specifically the processing of your bookings, the handling of event registrations, the handling of your ticket purchases and the analysis of your user behaviour.

Various third-party service providers are explicitly mentioned in this data protection declaration (e.g. in the sections "Newsletter", "Tracking Tools", "Re-Marketing", "When booking mountain railway tickets" and "Social plug-ins"). Another service provider to whom personal data are forwarded and/or has or can have access to personal data of yours is our web host (PlusServer GmbH, Welserstrasse 14, 51149 Cologne). The website is hosted on servers in Germany and in France.

Finally, in the event of payment by credit card on the website, we forward your credit card information to your credit card issuer and to the credit card acquirer. If you opt for payment by credit card, you will be asked in each case to enter all the mandatory information. With regard to the processing of your credit card information by these third parties, we ask you to also read the General Terms and Conditions of Business and the data protection declaration of your credit card issuer.

### **Communication of personal data abroad**

We are entitled to forward your data to third-party companies abroad if this is necessary in connection with the processing of your requests, the provision of services and marketing campaigns. These third-party companies are required to maintain the privacy of the users to the same extent as the provider itself. If the data protection level in a country is seen as inappropriate pursuant to the General Data Protection Regulation, we will ensure by means of a contract that your personal data are protected at all times according to the General Data Protection Regulation.

Various third-party service providers and the addresses of their registered offices are already mentioned in the previous section ("Forwarding of the data to third parties"). Individual third-party service providers named in this data protection declaration have their registered office in the USA (cf. "Tracking Tools", "Re-Marketing"; "When booking mountain railway tickets" and "Social plug-ins"). Other statements about data transfers to the USA can be found under "Tracking Tools".

### **Right to information, deletion and rectification**

You can request information about your personal data saved at our company at any time and free of charge. Requests for information must be submitted in writing with proof of identity. You are also entitled to demand the deletion or the rectification of your personal data stored at our company at any time.

You also have the right to request receipt of the data that you have handed over to us (right to data portability). On request, we will also transmit these data to a third party of your choice. You have the right to receive the data in a conventional file format.

You can do this by filing a corresponding application by e-mail to ([info@arosalenzerheide.ch](mailto:info@arosalenzerheide.ch)). Further contact options can be found under "Contact". We would like to point out to you that we reserve the right to demand proof of identity and that in the event of your data being deleted using our services this may not be possible, or may no longer be possible to provide the full data.

You may revoke consent to certain data processing at any time with future effect.

Please note that in accordance with the law certain data have to be retained over a certain period of time. Such data therefore must be stored at our company until the expiry of these periods. We block access to these data in our system and only use them to meet statutory requirements (cf. in this regard in detail "Retention of data" below).

### **Data security**

We use appropriate technical and organisational security measures that we deem suitable to protect your data saved by us against manipulation, partial or complete loss, or the unauthorised access by third parties. Our security measures are constantly being adjusted in accordance with technological development.

When you register with us as a customer, access to your customer account is only possible by entering your personal password each time. You should always treat your payment information as confidential and close the browser window when you have ended your communication with us, especially if you share usage of the computer with others.

We also take our own, company-internal data protection very seriously. Our employees and the service companies commissioned by us are required to not to disclosure data and to comply with provisions under data protection law. In addition, they are only granted access to the personal data to the extent that this is necessary.

### **Retention of data**

We only save personal data for as long as necessary

- to use the said tracking services within the framework of our legitimate interests;
- to implement services to the aforementioned extent you have requested or for which you have given your consent.

Contractual data will be retained longer by us as this is stipulated by statutory retention obligations. Retention obligations that require us to retain data result from accounting regulations and thus under fiscal law. In accordance with these provisions, business communication, concluded contracts and booking receipts are to be retained for up to 10 years. If we no longer require these data to carry out services for you, the data will be blocked. This means that the data may then only be used for accounting and tax purposes.

### **Contact**

If you have questions on data protection, require information or wish to have your data deleted, please contact us by sending an e-mail to ([info@arosalenzerheide.swiss](mailto:info@arosalenzerheide.swiss)).

### **Complaint to a data protection authority**

You have the right to file a complaint to a data protection supervisory authority at any time.