

Information about Data Protection for Touristmanager Operations

1. The Company and the Touristmanager

- 1.1. The company **B & B Föhrenegg, Daniel Schulte, Föhrenstrasse 4, 39020 Rabland, Tel. 0039 388 4555122 and E-Mail: info@foehrenegg.it** (hereafter Company) is responsible for the protection of data with regard to the processing of personal data in the Touristmanager software, which is used to manage guests.
- 1.2. The Company respects and protects the rights for the protection of data and privacy. They will take every measure legally required to protect the guests' personal data.
- 1.3. The following information will provide you with a quick, simple overview of that personal data that will be processed for you as an interested party and/or guest, for which purposes and on which legal basis. Furthermore, it will also inform you about your rights related to data protection, the so-called rights of the affected party.

2. Data Processing in Touristmanager

- 2.1. In particular, Touristmanager manages and processes the data of the Company's (potential) guests, specifically names, addresses, services used, 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. 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 Company will not be able to provide the services as a rule.
- 2.2. 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). The revocation may be declared by email sent to LTS at gdrp@LTS.it, whereby LTS will immediately transfer the revocation to the 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.
- 2.3. The Company operates as the IT service provider for the technical operation of Touristmanager on behalf of LTS, the Landesverband der Tourismusorganisationen Südtirols (National Association of Tourism Organizations in Southern Tyrol), via Conciapelli 60, 39100 Bolzano, Italy, Tel +39 0471 978060, Fax +39 0471 977661, e-Mail: info@LTS.it, Web: www.LTS.it, (hereafter LTS), which will receive the data indicated above under some circumstances. The Company has concluded the agreements necessary for data protection with LTS so that the data indicated above will only be processed in a legal and secure manner.

3. Information about the Rights of Affected Parties with regard to Data Protection

- 3.1 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 Item 2.2 above.

- 3.2 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.
- 3.3 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.
- 3.4 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.

- 3.5 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.
- 3.6 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.
- 3.7 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 contact data for the Italian Data Protection Authority is Garante per la protezione dei dati personali, Piazza di Monte Citorio 121, 00186 Rome, Italy, garante@gpdp.it.