

PRIVACY POLICY

Through this Privacy Policy, **Associació Agrupació dels Explotants de Remuntatges Mecànics** (hereinafter, we or **SKI ANDORRA**) informs you about the personal data we collect, how we treat them, and the rights that our applicable Data Protection regulations grant you in relation to them.

Applicable Data Protection regulations

1. Law 29/2021, of October 28, Qualified Protection of Personal Data of the Principality of Andorra (hereinafter, the **LQPD**);
2. Decree 391/2022, of 28-9-2022 approving the Regulations for the application of the LQPD, and
3. Regulation (EU) 679/2016 of the European Parliament and of the Council, of April 27, 2016, regarding the protection of natural persons with respect to the processing of personal data and the free circulation thereof (hereinafter, the **GDPR**).

In the following table you will find links to facilitate access to the points of this policy that are of interest to you, however, please, you must read all the sections of the [Legal Notice](#), the [cookies policy](#) and this privacy policy before to use this website:

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1. Who is responsible for the processing of your personal data?

Associació Agrupació dels Explotants de Remuntatges Mecànics (SKI ANDORRA), with Tax Registration Number S-700159-E and registered office at the street Valira, 2, AD500 Andorra la Vella Principality of Andorra.

We have a Data Protection Officer external – [Win2win, SLU](#), company specialized in privacy and personal data protection– whom you can contact by email at dpd@skiandorra.ad.

Additionally, if you are in the European Union, you are interested in knowing that our representative for data protection purposes is the company COMPLIANCE GAP MITIGATION, domiciled at Calle Ferraz 28, 2º Esq. 28008 Madrid, (Spain), with whom you can contact through the telephone numbers (+34) 917589441 and (+34) 915482701, or (preferably) by writing to SkiAndorra@compliancegapmitigation.com.

SKI ANDORRA is not responsible for the activities carried out by other websites, even if they are accessed through links on our website. That is why we strongly recommend that you carefully read the information provided by these other controllers before giving them your personal data (especially the privacy and cookie policies of each website you visit), and that you contact said controller if you have any concerns or questions.

2. How do we obtain your personal data?

In general, it is you who directly provide us with your personal data—for example, when you call us by phone or complete the forms on this website—. The only exceptions to this rule are:

- The data about you that may appear in reservations of which the holder has made you the beneficiary, or that they provide us about you in the emails we receive;
- The last four digits of your credit card, together with the amount of the purchase and the transaction number returned to us by our payment service provider, as they will be necessary in the event that you wish to consult or revoke the transaction;
- The contact details provided to us by our service and product providers when you act as their commercial or contractual representative;
- The images that correspond to any news in which we consider that the public interest and the right to information prevail over the possible interests of the people whose image or other personal data is published on our website;
- The personal data about you that may appear in the emails we receive; and

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- The cookies on this website, about which you will find more information in our cookie policy.

3. What do we use your data for and on what legal basis do we do it?

To confirm your identity

If we do not know you, we may use your personal data to confirm your identity and, if necessary, the entity for which you work and your role within that entity. We do this when we are subject to legal obligations that require us to authenticate your identity before processing your data further, or when it is our legitimate interest to ensure that your request is genuine and not made for fraudulent reasons or spam. To initiate or maintain the relationship with our suppliers

If you represent a provider of products or services, we collect your contact information and your signature for the purposes of:

- a) Managing our relationships of all kinds with the supplier you represent.
- b) Managing the corresponding record of our list of authorized suppliers.
- c) Managing the budgets and invoices of the supplier you represent.

The processing linked to purposes a) and b) are legitimized by the employment or service contract that you have signed with the provider you represent and our legitimate interest in contacting them. And the processing linked to the purpose c) is legitimated because it is necessary for the execution of the contract you have signed with us.

To initiate and maintain the relationship with our suppliers

If you represent a provider of products or services, we collect your contact details and your signature to:

- a) Manage our relationships of all kinds with the supplier you represent.
- b) Manage the corresponding file of our list of authorized suppliers.
- c) Manage the budgets and invoices of the provider you represent.

The processing linked to the purposes a) and b) are legitimized by the employment or service contract that you have signed with the provider you represent and our legitimate interest in contacting them. And the treatments linked to the purpose c) are legitimized to be necessary for the execution of the contract or contracts that you have signed with us.

To initiate and maintain the relationship with our clients

We collect your data that we receive orally or in writing directly from you or from a third party that you represent or of which you are a beneficiary, when you rent or buy us a service or product (for example, a ski pass) in order to manage said contract.

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Additionally, we inform you that, as a result of this contractual relationship, we can communicate orally or in writing commercial information related to SKI ANDORRA.

The processing of this data is legitimized because it is necessary for the execution of the service or product contract in which you are an interested party, and because of our legitimate interest in keeping you informed in relation to the products or services purchased.

To manage your purchases online or in the office, for example, the recharge of the school ski pass

We collect the data that you provide us in relation to the selection or purchase of services or products, to:

- Process your purchase;
- Remember it to make it easier for you to select products in the future;
- Communicate by email or by phone any related information that may be of interest to you; and
- Manage and issue supporting documents of the sales contract that you sign when making or sending us the order.

We can also use the data that you provide us during the purchase To extract statistics regarding the interest that our products and services arouse.

The basis that legitimizes these treatments is the sales contract that you sign when paying for your order through our payment service provider (responsible for the entire payment operation, including the collection and verification of your payment card data), and our legitimate interest in improving the quality of the shopping experience and of our products and services.

To select and hire our staff

We treat the data of the CV that you voluntarily send us to manage the relationship with the candidates for a job position at SKI ANDORRA, including the process of searching, filtering and storing the CVs of potential candidates, the personnel selection process and the process of hiring.

The basis of legitimacy for the aforementioned processing is your consent, which you express when you send us your CV, the execution of pre-contractual measures, and if we do not have an open contracting process or you are not selected and we consider that you can fit in future selection processes, our legitimate interest in keeping your CV to include it in said future processes.

To attend to your requests, queries or claims

We collect the personal data that you provide us in your emails, by phone, or through the form on the contact page or the requests for the exercise of rights, to attend to your

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requests, queries or claims in relation to our services, or to attend the rights that you have about your personal data.

Sometimes, in order to respond to you, we may be forced to collect additional information by requesting it from third parties. If that is the case, we will anonymize said information collection, so that no one can link it to you. If, due to the characteristics of your request, it is not possible to anonymize it, we will treat the information collected as your personal data and we will communicate it to you with due diligence, respecting the restrictions of the concept of personal data that defines the regulations that apply to us and the rights and freedom of the other persons who may be affected by said communication.

The data that is marked as mandatory in the forms is the minimum necessary to meet your request, while the non-mandatory data allow us to personalize our service even more. If you don't provide us with the non-mandatory data, nothing will happen, except that our response will be less accurate than it probably could have been if we had it.

The legal basis of this processing is the consent that you express when sending or giving us these data, our legal obligation to attend to your requests for rights, and our legitimate interest in serving you. The provision of your personal data is, therefore, voluntary, although if you do not provide us with the personal data that we need, we will not be able to process your request, query or claim. You can revoke your consent whenever you wish, although, likewise, such revocation will make it impossible to continue processing your request, query or claim.

To manage any future claims

We keep blocked the data that may be necessary to manage your possible claims, or ours, based on our legitimate interest in defending ourselves to safeguard our rights.

To guard and return the objects that you lose in our facilities

If you have lost a mobile phone or any other object that contains personal data, we will keep said personal data until the legitimate owner of the lost object successfully claims it at our customer service point or, after a reasonable time, we deliver it to the police authorities so that they are the ones who manage their custody and eventual return.

The basis that legitimizes us to process personal data from mobile phones, wallets, backpacks and other objects that may contain personal data in this way is our legitimate interest in preventing their theft and returning them to you.

To ensure the proper functioning of our website (functional cookies)

We use functional cookies to ensure the proper functioning of our website.

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As these cookies are necessary for the proper functioning of the website, their use does not require you to give us your consent, and the basis that legitimizes us to use them is our legitimate interest in being able to offer you the services of our website.

You can find more information about these cookies in our cookie policy.

To extract aggregate statistics of the use that visitors make of our website (analytical cookies)

We use analytical or statistical cookies to identify the most and least visited pages, analyze what content is of greatest interest to our visitors, and measure the success of our information campaigns, all with the aim of improving the services we offer you through the Web. All these purposes provide aggregated results, in which it is not possible to identify the interests of any specific person.

As these are non-necessary cookies, we will not use them until we have your consent, and not giving it to us or withdrawing it will have no effect other than hindering our goal of improving the website by analyzing aggregate statistics of our visitors' browsing.

You can find more information about these cookies in our cookie policy.

To be able to use Google services

Additionally, as an obligation that Google LLC imposes on the entities that, like us, use the Google services, we inform you that these services are operated by Google Inc., domiciled at 1600 Amphitheater Parkway, Mountain View, CA 94043, USA, and that Google Inc. is a beneficiary party of them.

The information generated by the cookies about your use of this website and your advertising preferences is generally transmitted to a Google server in the USA and stored there. If you want more information, you can consult [the page that describes how Google uses the information on our website](#) and/or [Google's privacy policy](#) regarding the aforementioned services.

We inform you that we have activated the IP anonymization function to our website, in order to add additional safeguards in the standard contractual clauses that protect this international data transfer to the USA. With this, Google will shorten your IP address before transmitting it to the USA (identity obfuscation process). Only in exceptional cases is the full IP address sent to a Google server in the USA and abbreviated there. Google guarantees that the IP address transmitted by your browser to Google Analytics will not be processed together with any other data held by Google.

You can review the categories of personal data processed by these services at privacy.google.com/businesses/adsservices.

To notify you of security breaches

At SKI ANDORRA we assume security measures appropriate to the level of risk to protect personal information against loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal information; however, if we determine that personal data has been misappropriated (including by an employee or former employee of Olyseum), exposed by a security breach, or improperly acquired by a third party, exposing data subjects to high risk, we will inform those data subjects immediately about this security breach, misappropriation or acquisition, and about the measures we have taken and those that are recommended to the data subject so that the breach does not affect them.

The basis that legitimizes this treatment is the legal obligation set forth in article 37 of the LQPD and 34 of the GDPR, and our legitimate interest in preventing this security breach from harming data subjects.

For other purposes that are not incompatible with the above

We may use your personal data for other purposes that are not incompatible with those indicated above (such as archiving purposes for reasons of public interest, scientific or historical research purposes, or statistical purposes) provided that it is permitted by the regulations in force for what regards personal data protection, and, of course, acting in accordance with these and with the rest of the applicable regulations.

4. With whom can we share your personal data?

We do not share with anyone your personal data, unless:

- You are the one who requests it.
- We have a legal obligation to do so (for example, we are legally obliged to provide copies of invoices to the Department of Taxes and Borders of the Government of Andorra when requested to do so).
- You contract our products or services through intermediaries (for example, your parents) to whom we have to deliver the products or services that they have purchased on your behalf, with your consent, because they represent you legally, or because you have explicitly authorized us,
- We are co-responsible for data collection, so that, always with your consent, other entities process them on their own behalf. This is the case of:
 - Google Ireland Ltd, with registered office at Gordon House 4, Barrow - Dublin, Ireland, which acts as SKI ANDORRA's data processor for the processing of cookie data that is necessary to use its Analytics and Ads services, and as independent controller for all processing carried out on your behalf in accordance with its privacy policy. We transfer data to Google Ireland Ltd based on the data protection agreement that said company located in the EU includes in the addendum to the standard contract for the countries appropriate to the GDPR, as is the case of

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Andorra, to which we add the additional safeguard of activating the anonymization of the IPs that collect the cookies.

- We need to protect your rights, our rights, those of our employees, or those of third parties (which may require disclosure to the police for security reasons or to health authorities to prevent the spread of disease, for example, for contacts tracing purposes).
- We need them to be processed by our service providers, on our behalf, and under the terms and conditions of the corresponding data processor contract.
- They may have access to personal data on our Website or in our systems from time to time, although they do not need to process it on our behalf. This is the case, for example, of the web development and maintenance company or of some of the services of our IT or hosting service providers. Since they could access SKI ANDORRA data, they have signed a service provision contract that obliges them to maintain the same level of privacy that we have at SKI ANDORRA.

Any international transfer that we eventually need to make will comply with what is established by the regulations in force that apply to us.

5. How long do we keep your personal data?

SKI ANDORRA keeps your personal data exclusively for the duration of the processing activities that require them, and, afterwards, we will keep them blocked for as long as it takes to prescribe the legal responsibilities that apply to us at all times, derived from the processing in question (including the obligation to be able to demonstrate that we have responded to your request for the destruction of personal data).

We inform you that we will destroy your CV when it is more than five years old, considering that it is outdated in relation to the purpose for which it is dedicated.

When we do not have a legitimate purpose to process some of your personal data, we will delete or anonymize those data, and if this is not possible (for example, because they are in backup copies), we will store them securely and block it to isolate them from any further processing until deletion is possible.

6. What rights do you have?

You have the right to obtain confirmation as to whether or not SKI ANDORRA has any personal data of you.

We remind you that when you share personal data with other controllers, you must exercise your rights directly against those controllers, following the instructions provided in their own privacy policies. Specifically, in relation to the data that our cookies share with Google, we inform you that you can install in your browser Chrome, Internet Explorer, Safari, Firefox and/or Opera, the [plugin to not send Google Analytics data to Google Inc.](#)

Next, we explain what other rights you have and how to exercise them.

Your rights

In accordance with the provisions of the LQPD and the GDPR, you can request the execution of the following rights:

- [Access to your personal data](#).
- [Rectification of any of your personal data](#), specifying the reason.
- [Erasure of some or all of your personal data](#).
- [Limitation of the processing of your data](#), specifying the reason for the limitation.
- [Opposition to the processing of your personal data](#).
- [Portability of your data](#) when the legitimacy basis for its collection has been your consent or a contract.
- [Right not to be subject to automated individual decisions](#).

Where and how you can exercise your rights

You can exercise your rights:

1. By sending a written request, addressed to SKI ANDORRA, indicating a means of contact to be able to respond to your request, or request more information if necessary. We would appreciate it if you would indicate us in the envelope "Exercise of Personal Data Protection Rights".
2. By sending the form associated with the right you wish to exercise, or a message containing said information, to the email address dpd@skiandorra.ad, indicating in the subject "Exercise of Personal Data Protection Rights". You will find these forms later, in this same section of this privacy policy.

In both cases, if it is not possible for us to verify that you are who you say you are, we will ask you to please send us proof of your identity, and thus ensure that we only respond to the data subject or his/her legal representative.

If the person sending the mail does so as a representative of the data subject, the accreditation of the representative must be done through documents or legal instruments that correctly identify the data subject and the representative and specify the assignment or the procedure by which delegate representation.

Likewise, if you consider that you have not obtained full satisfaction in the care of the exercise of your rights, we inform you that you can file a claim with the national control authority of your country, or by contacting the Andorran Data Protection Agency for this purpose ([APDA](#)).

Forms for the exercise of your rights

In order to facilitate the exercise of your rights, we recommend that you use the corresponding application forms from among the following:

- [Form for exercising the right of access](#)

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- [Form for exercising the right of rectification](#)
- Form for exercising the right to object ([model A](#), and [model B](#))
- [Form for exercising the right of erasure](#)
- [Form for exercising the right to limitation of processing](#)
- [Form for exercising the right to portability](#)
- [Form for exercising the right not to be subject to automated individual decisions](#)

7. What responsibilities do you have?

By providing us with your data, you guarantee that they are accurate and complete. Likewise, you confirm that you are responsible for the veracity of the personal data that you have communicated to us and that you will keep them conveniently updated so that they respond to your real situation, holding you responsible for false or inaccurate personal data that you may provide us, as well as for the damages, direct or indirect, that may arise from your inaccuracy.

You cannot provide us with personal data of other people unless it is justified in relation to the services you request from us. In any case, if you provide us with the personal data of third parties, you assume the responsibility of informing said third parties before providing us with their personal data. This information that you must provide to third parties whose data you provide us, must include all the provisions set forth in this privacy policy, and it is you who is responsible for the legality of this personal data and for transmitting it to its owners whose rights they have in relation to your personal data.

In the cases in which you have to provide us with personal data of a minor under 16 years of age or of a person who has limited rights, by doing so you are obliged to have the authorization of the holders of their parental authority or guardianship. Without this authorization, it is forbidden for you to provide us with any personal data of these people.

8. How do we protect your personal data?

We are fully committed to protecting your privacy and personal data. We have prepared a record of all the personal data processing activities (ROP) that we carry out, we have analysed the risk that each of these activities may pose to you, and we have implemented the appropriate legal, technical and organizational safeguards to avoid, as far as possible, the alteration of your personal data, its misuse, loss, theft, unauthorized access, or unauthorized processing. We keep our policies up to date to ensure that we provide you with all the information we have about the processing of your personal data, and to ensure that our staff receive the appropriate guidelines regarding how they should treat your personal data. We have signed data protection clauses and or data protection agreement with all our service providers, taking into account the need that each one has to process personal data.

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We restrict access to personal data to those employees who really need to know it to carry out any of the processing activities referred to in this policy, and we have trained and made them aware of the importance of confidentiality and maintaining the integrity and availability of information, as well as on the disciplinary measures that any possible infraction in this matter would imply.

However, if we determine that your data has been misappropriated (including by an employee or former employee of SKI ANDORRA), exposed by a security breach, or improperly acquired by a third party, exposing you to high risk, we will notify you immediately about this security breach, misappropriation or acquisition, and about the measures we have taken and those that we recommend you take so that the breach does not affect you or affects the minimum.

9. Modifications of this Privacy Policy

We will update this policy when necessary to reflect any changes that occur in the regulations or in our processing activities. If the changes are important, we will notify you before they come into force by sending you a notice or posting a prominent notice on this website, and you will have the option to exercise your rights as we have informed in a previous section. In any case, we recommend that you periodically review this privacy policy to learn how we protect your personal data.

If you have any questions about this policy, do not hesitate to contact us by sending an email to dpd@skiandorra.ad.

Last update: April 15, 2022