

Privacy and Cookies Policy – www.essverbier.ch

§1 Information about the collection of personal data

- (1) The purpose of this document is to provide information about the collection of personal data when using our website www.essverbier.ch. Personal data is all data that is personally related to you, e.g. name, address, email address, phone number, the classes that you wish to book, the number of children that you wish to enrol in each class and your user behaviour.
- (2) The Data Controller under Article 4 (7) General Data Protection Regulation (GDPR) is: Ecole Suisse de Ski de Verbier – a *société coopérative* [cooperative enterprise], whose registered address is 41 route de Médran, CH-1936 Verbier (Bagnes municipality). Any questions about the collection of personal data should be sent by email to info@verbiersportplus.ch
- (3) When you contact us by email, the contact information you provide, as well as the content of your message, is saved so that we can answer your questions. We delete the data once there is no longer any need to retain it to respond to your queries, or we restrict the processing of this data if there are statutory obligations concerning data retention.
- (4) When you make a booking via our online form, the following items of personal data, which you supply to us, are collected: client's last name and first name, postal address, email address, telephone numbers, collection or despatch of tickets and bibs, learner's last name and first name, learner's date of birth, type of class required, level, times of classes, dates of classes, meals required, preferred instructor, learner's language, number of learners, cancellation insurance, type of credit card, credit card holder, credit card number, credit card expiry date, credit card security code, selected means of payment and payment details. If you do not supply all this data, we will be unable to follow up your booking request. Your credit card data is sent to our payment processing partner. This partner has its registered office in Switzerland. For legal reasons (limitation period, obligation to retain accounting documents), your data is retained for 10 years after the year during which your payment was received.
- (5) We provide detailed information below concerning the process related to the use of your data for advertising purposes. We also state the criteria that are fixed concerning the period of time for which your personal data is stored.

§ 2 Your rights

(1) You have the following rights in relation to personal data held about you:

- a. Right of access/right to information about the processing of data
- b. Right to rectification or erasure of the data
- c. Right to restriction of processing of the data
- d. Right to object to the processing of data
- e. Right to data portability

(2) You also have the right to complain to a supervisory authority responsible for monitoring data protection about the processing of your personal data.

§ 3 Collection of personal data when visiting our website

(1) If the web page is used simply for information, i.e. when you do not send us additional information, only the data that your browser sends to our server is collected. If you wish to view our website, we collect the data listed below, which is necessary technically for the website to be displayed and to ensure its stability and security (the legal basis for this processing is Article 6(1)(f) GDPR):

- IP address
- Date and time of server request
- Time zone difference from Greenwich Mean Time (GMT)
- Content of requests (specific page)
- Access status/HTTP status code
- Volume of data transmitted
- Website from which the request comes
- Browser
- Operating system and its interface
- Browser language and version

(2) In addition, cookies will be stored on your computer when you use our website. Cookies are small text files that are saved to your hard drive and deliver predetermined information depending on the function that we give to them. Cookies cannot run programs or infect your computer with a virus. They are used to enhance the overall user-friendliness and efficiency of our website.

(3) Use of cookies:

a) This website uses the following types of cookie, the scope and functionality of which are explained below:

- Transient cookies (see b) below)
- Persistent cookies (see c) below)

b) Transient cookies are automatically deleted when you close your browser. This category includes, in particular, session cookies. These cookies store a session identifier which is associated with different requests from your browser. Your computer can thus be recognized if you return to our website. Session cookies are deleted when you log off or close your browser.

c) Persistent cookies are deleted automatically after a specified period of time, which may vary depending on the cookie. You may delete the cookies at any time using your browser's security settings.

d) You may configure your browser settings according to your preferences and therefore, for example, reject third-party cookies or all cookies. Please note that if you reject cookies, you may not be able to use all the functions of this website.

e) We use the following cookies:

Provider	Name	Purpose	Expires
Google Analytics	Ga	Identifies visitors using a unique identifier	2 years after the last visit
Google Analytics	Gid	Indicates the search engine you used to access the site	30 minutes after website was last loaded; expires at the end of each day at the latest

f) We also use cookies that enable you to connect to services provided by third parties:

- Facebook connect (see § 3 (4) below)
- Twitter Button (see § 3 (4) below)
- Twitter Syndication
- Google+ Platform (see § 3 (4) below)
- LinkedIn Widgets

(4) Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google Inc. ("Google") that is based on the storage of cookies with the user. These cookies are used to analyse the way you use this website. The information obtained via the cookies about your use of this website is sent to and stored on a server in the U.S.A. Your IP address is truncated (anonymized) within the European Union or Switzerland via the "anonymize_ip" function before being sent to the U.S.A. This makes it impossible to identify individual users from the IP addresses collected. That said, it may very occasionally be the case that your IP address is truncated in the U.S.A., after it has been transferred to one of Google's servers.

Google uses this information, with authorisation from the operator, to analyse your use of this website, to compile reports on users' activities and to provide the operator of this website with other services related to the use of said website.

You can stop your IP address being collected and prevent Google from using the information gathered by downloading and installing the following plug-in on your browser: <http://tools.google.com/dlpage/gaoptout?hl=en>.

(5) Social media plugins

a) We use the following plugins, which allow you to connect to and follow us on the eponymous social networks: Facebook, Twitter and Google+. Clicking on the corresponding social network button enables you to enter into communication directly with the social network concerned and to interact with other users of this social network. In this case, the operator of the social network receives the information that you viewed our online offer as well as the data listed in section 3 (1) above.

b) We have no influence on the data collected or the processing operations performed by the operator of the social network. We do not know the extent of the collection of personal data, the purposes of the processing or the time-limits for the retention of data. Nor do we have any information concerning the deletion of data sent to the social network.

c) The operator of the social network organises the data collected about you in the form of a user profile and uses this data for the purposes of commercial advertising, market surveys and improving its own services. The data is used in these ways (for non-registered users as well) in order to offer targeted advertising to users of the social network and to inform these users of your activities on our website. If you wish to object to your personal data being processed as described above, you should contact the social network concerned.

d) The transmission of data takes place regardless of whether you have an account with the social network concerned or whether you are connected to it. When you are

connected to a social network, the data collected is associated directly with your account with that network. Depending on the actions that you take on the social network, your contacts may be informed publicly of your activity.

e) You can obtain further information about the data collected and the processing performed, directly from the operator of the social network, using the following links:

Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland;
<http://www.facebook.com/policy.php>;
<https://www.facebook.com/help/186325668085084/>; Facebook participates in the EU-US Privacy Shield and Swiss-US Privacy Shield frameworks.

Twitter Inc., 1355 Market St, Suite 900, San Francisco, CA 94103, USA;
<https://twitter.com/privacy>. Twitter participates in the EU-US Privacy Shield and Swiss-US Privacy Shield frameworks.

Google Inc., 1600 Amphitheater Parkway, Mountainview, CA 94043, USA;
<https://www.google.com/policies/privacy/partners/?hl=en>. Google participates in the EU-US Privacy Shield and Swiss-US Privacy Shield frameworks.

§4 Objection or withdrawal of consent to the processing of your data

(1) If you have given your consent to the processing of your personal data, you may withdraw that consent at any time. This applies, for example, if you have agreed to your image featuring on our website. This type of withdrawal of consent affects only the processing of data after the notification of withdrawal. Therefore, withdrawal of your consent does not affect the lawfulness of processing based on this consent before withdrawal.

(2) If our processing of your personal data is based on our overriding interest, you can object to the processing. This is the case, for example, if the processing is not necessary to the fulfilment of a contract made with you. If you exercise this right to object, we will ask you to explain the reasons why we should not process your personal data in the way that we have done up to that point. If your objection is justified, we will examine the situation and we will stop or restrict the processing of data or we will indicate the overriding interests that will be our basis for continuing to process your personal data.

(3) Of course, you may object at any time to the processing of your personal data for advertising or data analysis purposes. You may inform us of your objection by sending an email to the following address: info@verbiersportplus.ch.