



Val Thorens
SETAM

INTERNET PRIVACY POLICY

1 PURPOSE OF THE POLICY

SETAM attaches great importance to respecting privacy. This is one of the reasons why we have developed our own privacy and data protection policy.

We are committed to protecting your privacy rights and ensuring that your personal data is protected.

This privacy policy gives details the types of personal data we collect, how we process it and how we protect it, in relation to the services we offer.

Data is collected when you carry out a procedure on the digital platforms (websites, kiosks) provided by SETAM.

This privacy policy applies to all websites, applications, competitions and any other online initiatives managed by SETAM that collect personal data. Therefore, this policy does not apply to third party websites, including those that may be mentioned via a web link.

It also reminds you of your rights and how to exercise them.

We ensure appropriate technical and organisational measures are in place to protect the personal data you provide to us against accidental or unlawful destruction, loss, alteration, disclosure or unauthorised access to your personal data.

This External Policy on Privacy and the Protection of Personal Data is published by SETAM represented by its Managing Director, Jérôme GRELLET, as the data controller.

2 YOUR RIGHTS AND HOW TO EXERCISE THEM ?

The Data Protection Act of 6 January 1978 and regulation 2016/679 of the European Parliament and Council of 27 April 2016 grant you specific rights such as the right to obtain consent, to access or object to personal data concerning you as well as to rectify or delete incomplete or inaccurate information concerning you.

You may also choose to give instructions on the retention, deletion and disclosure of your personal data after your death.

If you believe that the way in which we have processed your personal data breaches data protection legislation, you may submit a complaint to the relevant supervisory authorities (CNIL: <https://www.cnil.fr/fr/plaintes>), in the Member State of your usual residence, your place of work or the place of the alleged breach.

You may exercise any of these rights by:

- e-mailing us at: dposetam@valthorens.com
- contacting us via the various online contact forms on our sites



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- writing to us: SETAM - à l'attention du DPO - 243 RUE DE LA LOMBARDE VAL THORENS 73440 LES BELLEVILLE, FRANCE

- following the instructions on the CNIL website at this address: <https://www.cnil.fr/agir>

3 PERSONAL DATA

Personal data refers to information that is likely to identify you directly or indirectly. It generally includes information such as your name, postal and e-mail address and telephone number, but also other information such as your IP address, login and browsing data.

When you provide us with your personal data, we process it in accordance with this policy.

If you do not agree with the terms of this policy, you are free not to provide any personal data. However, you should be aware that the provision of certain personal data is a condition to access services and that failure to provide such data may result in the non-functioning of certain features and services.

Please see the following section for details of the different types of personal data we may collect, the purposes for which it is collected and the legal basis for its processing.

3.1 DATA PROCESSED, BASIS AND PURPOSES OF PROCESSING

The personal data collected about you includes (depending on your choices and the settings of your terminal, particularly in relation to cookies): your title, surname, first name, email address, postal address, country, telephone number, payment information (for online sales), your connection logs (IP address), connection data and browsing data, preferences and centres of interest, products consulted as well as the information you provide when you contact us (mainly for archiving purposes).

Your personal data is collected in order to:

- Respond to your questions, complaints, registrations, or your orders and reservations of documents, products or services, sent by e-mail or via our contact, registration and online purchase forms;
- Send you information (newsletters, offers and promotions) when you have requested them;
- Allow you to access services (online photo library and Wifi);
- Analyse statistics;
- Prevent fraud.

The data required to fulfil the purposes described above are indicated by an asterisk on the various pages of our sites and applications. If you do not fill in these mandatory fields, we will not be able to respond to your requests and/or provide you with the requested services. The other information is optional and allows us to improve our services to you.



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The processing of your personal data is justified by different legal grounds depending on the use we make of the personal data. Below are the legal bases and retention periods that we apply to our main processing operations.

Among the applicable legal bases, in accordance with article 6.1. of the European regulation on the protection of personal data and article 7 of the Data Protection Act, we use the following

- Legal obligation: the processing of your personal data is made compulsory by a legal text
- The contract: the processing of personal data is necessary for the execution of the contract to which you have consented, this may be the case when you purchase a lift pass or subscribe to a SETAM service
- Legitimate interest: the processing is necessary to satisfy the legitimate interest of the organisation
- Consent: you agree to the processing of your personal data by means of an express consent (check box, click, subscription to a newsletter). You can withdraw this consent at any time

3.2 RECIPIENTS

The personal data collected are intended for the internal services of SETAM authorised to take cognisance of them.

In the event that we entrust data processing activities to subcontractors, only subcontractors that present sufficient guarantees regarding the implementation of appropriate technical and organisational measures are used so that the processing meets the reliability and security requirements of the applicable regulations and guarantees the protection of the rights of individuals. SETAM undertakes to use only subcontractors based in the European Economic Area or in countries recognised by the European Commission as having an adequate level of data protection legislation.

In accordance with the regulations in force, your personal data may be transmitted to authorised third parties (public bodies, judicial authorities, court officers and ministerial officers) by a legislative or regulatory provision, in the context of a particular mission or the exercise of a right of communication.

3.3 DATA RETENTION PERIODS

SETAM keeps data confidential for the time necessary for the processing for which it was collected and in compliance with the legal deadlines in force.

Your data is then archived with restricted access for an additional period of time for limited reasons authorised by the law (legal obligation, litigation, disputes, etc.).

These periods vary according to the requests, procedures or orders and depend on legal requirements.

You will find some examples of retention periods in the table below:



Purpose of processing	Legal basis	Retention period in active database	Archiving	Comments
Customer management	Contract	5 years from the last activity	5 to 10 years	
Electronic canvassing	Legitimate interest	3 years from the last activity		You can object at any time by contacting us
Telephone canvassing	Legitimate interest	3 years from the last activity		You can object at any time by contacting us
Electronic prospecting by third parties	Consent	3 years from the last activity		You can withdraw your consent at any time by contacting us
Data rights management	Legal obligation	1 year		
Sending of newsletter	Consent	Until unsubscription		You can withdraw your consent at any time by contacting us

4 ADVERTISING AND UPDATING OF THE POLICY

This policy comes into force on 25 May 2018. This procedure may be updated at any time.

Only the French language version of this policy has any legal validity. This English language translation is provided for information purposes only.