

DATA PROTECTION DECLARATION ON THE PROCESSING OF PERSONAL DATA

This privacy policy provides information on how personal data is processed in connection with the use of the customer's chatbot at www.dolomitisuperski.com ("website") and the use of the chatbot "GAIA" ('Mythi') – in accordance with Regulation (EU) 2016/679 ("GDPR").

It supplements the customer's general privacy policy for visitors to the website. We recommend that you also read this general privacy policy to get a complete picture of how data is processed.

The chatbot "GAIA" serves exclusively to provide users with fast, barrier-free, and interactive access to various information on the website. Use for other purposes not agreed upon for this purpose is excluded.

Use of our chatbot requires that you have accepted this privacy policy.

1) Data collected and its processing in the chatbot

1a) Content of the interaction

All messages that you send or receive via the chatbot are processed in order to enable dialogue. We never ask you to enter personal data that could identify you or another person. This includes contact details, addresses, tax numbers, and similar information.

The provision of personal data is neither contractually nor legally required and is also not necessary for the functionality of the chatbots. You will not suffer any disadvantages if you do not provide this information. As recommended, we ask that you do not disclose such identifying information.

1b) Special categories of personal data

As already described under "Content of the interaction," we also ask that you never provide sensitive data such as health data.

1c) System and access information

In order to provide and securely operate the "GAIA" chatbot, various technical information is automatically collected. This includes, among other things, a randomly generated, pseudonymous client ID, browser data (e.g., version and language), date and time of access, configured time zone, and information about the operating system of the end device. In addition, the so-called referrer URL (i.e., the page from which the chatbot was accessed) and technical log data of the system are collected.

1d) Voluntary evaluation of responses and evaluation of the chatbot

If you would like to rate our chatbot's responses and thus help to improve it, e.g., by giving it a thumbs up or thumbs down, this information will also be collected and used to improve the chatbot.

1e) Processing methods and cookiesDieser Chatbot verwendet folgende Cookies:

- Chat Key: This is a number that identifies the chat itself so that the chat history is not lost and the chat is preserved (e.g., when switching to another window). The storage period for this cookie is: 2 to 3 days
- Chat Client ID: Each user receives a randomly generated Client ID. This serves to make chats traceable. Without additional information, this cannot be assigned to any person and therefore belongs to pseudonymous data. The storage period for this cookie is: 1 year.
- Chat privacy: This cookie is created as soon as you agree to the privacy policy in the chat. This allows us to verify that the privacy policy has been confirmed. The storage period for this cookie is: 7 days

The legal basis for setting these cookies is Art. 6 (1) (f) of the General Data Protection Regulation, safeguarding the legitimate interests of the controller in ensuring a useful and efficient user experience.

2) Processing purposes and data transfer

2a) Data recipients, processors, and data transfer

This chatbot uses the OpenAI language model ("ChatGPT"). Its headquarters are located at: 3180 18th St, San Francisco, California 94110, USA. By default, processing takes place via the data center in Ireland at the following address: The Liffey Trust Centre, 117-126 Sheriff Street Uppe, Dublin 1, D01 YC43, Ireland. Regardless of this, this provider does not receive any information or personal data from users or chat content. We use this provider on the basis of technical necessity and legitimate interest in order to offer you a powerful and helpful chatbot.

2b) Operational security, stability, and maintenance

As part of ongoing operations, we automatically collect technical and network-related data that may allow conclusions to be drawn about identity. This data is used to troubleshoot errors, provide technical support, perform system tests, prevent security issues, and monitor system performance. In addition, the data collected is generally only evaluated in aggregated or anonymized form, e.g., to determine the frequency of use of certain functions or the processing time of individual requests. The legal basis for these purposes is Art. 6(1)(f) of the General Data Protection Regulation, safeguarding the legitimate interests of the controller.

2c) Quality assurance, content updates, and reporting

Selected conversation excerpts may be used to ensure the quality of the chatbot's content. In order to avoid processing personal data, the chats may be used for quality assurance, content updates, and reporting, but only after all identifying information has been removed. The legal basis for these purposes is Art. 6 (1) (f) of the General Data Protection Regulation, safeguarding the legitimate interests of the controller. If you do provide personal data, this is considered consent in accordance with Art. 6 (1) (a) of the GDPR or Art. 9 (2) (a)

2d) Fulfilment of legal obligations

In order to protect our own rights and to fulfil legal obligations, it is possible that personal data may be passed on to authorities, for example. The legal basis for this is Art. 6 (1) (c) of the GDPR.

Under certain circumstances, external suppliers, such as external IT service providers, may also be given access to personal data. Processors have been appointed in writing as processors in accordance with Art. 28 of the GDPR.

3. Rights of data subjects

As a user of the "GAIA" chatbot, you are entitled to the rights set out in Articles 15 to 21 of the GDPR, insofar as personal data has been provided and chat content can be attributed to you. These include in particular:

- Right of revocation - You can revoke your consent at any time.
- Right to information – You have the right to request confirmation from the controller at any time as to whether personal data concerning you is being processed; if this is the case, you have the right to obtain information about the data processing concerning you (Article 15 GDPR).
- Right to rectification – You can update/correct incorrect data (Article 16 GDPR).
- Right to erasure – You can have your data erased at any time (Art. 17 GDPR), provided that there are no legal provisions preventing erasure.
- Right to restriction – You can request at any time that processing be restricted and, for example, request for what purposes your data may be processed (Art. 18 GDPR).
- Right to data portability – You may request at any time to receive your data in a machine-readable format or to have it transferred to another controller (Art. 20 GDPR)

Right to object – You may object at any time to data processing based on legitimate interest (Art. 21 GDPR)

You also have the right to lodge a complaint with a data protection authority at any time, for example in your country of residence or at the location of the alleged infringement. In Italy, this is the "Garante per la protezione dei dati personali."

4. Use by minors

This chatbot is not intended for use by minors. We therefore do not collect or store any data from underage visitors (except unintentionally). Persons under the age of 18 are therefore not permitted to use the chatbot.

5. Changes to this privacy policy and inquiries/clarifications

This privacy policy may be updated at any time.

If you have any questions about this privacy policy or uncertainties about how we process data, please contact us at the above addresses.

Information pursuant to Articles 12 and 13 of EU Regulation 2016/679

Data controller

Federconsorzi Dolomiti Superski

Via Arnaria 43

39040 Kastelruth (BZ)

customercare@dolomitisuperski.com

Contact details of the data protection officer

dpo@dolomitisuperski.com