

# Privacy policy Speciale Lodges SA

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## 1. General information on this privacy policy

The protection of your personal data, which the Hotel Bernina Hospiz collects and processes as part of its business activities, is carried out in accordance with the provisions of the Swiss Data Protection Act (DSG) and Art. 13 GDPR of the EU General Data Protection Regulation (GDPR).

In the event that the EU GDPR applies, we process your data as follows:

The legal basis for obtaining consent is Art. 6 para. 1 lit. a in conjunction with Art. 7 GDPR. Art. 7 GDPR. The legal basis for processing for the fulfilment of our services and implementation of contractual measures as well as for answering enquiries is Art. 6 para. 1 lit. b GDPR. The legal basis for processing for the fulfilment of our legal obligations is Art. 6 para. 1 lit. c GDPR. If the processing of your data is necessary to safeguard a legitimate interest of our company or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis for the processing. In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d GDPR serves as the legal basis.

This privacy policy provides information on how and for what purposes we process your personal data and what rights you are entitled to. The term "**personal data**", or "data" for short, refers to all details and information relating to you, your child, an identified or identifiable natural person and "**processing**" means any handling of such data, e.g. obtaining, storing, using, disclosing and deleting.

If you disclose data about other persons (e.g. family members) to us, we assume that you are authorised to do so and that this data is correct, and that you have ensured that these persons have been informed of this disclosure.

## 2. Controller for the processing of personal data

Speciale Lodges SA  
Via Dal Bernina 2371  
7710 Poschiavo  
Switzerland  
info@bernina-hospiz.ch

## 3. Which data we process and for what purpose

We mainly process personal data in order to provide our services in the context of our hotel.

### 3.1. The most important categories of data that we process

**Master data:** Basic data such as name, contact details, personal data, photos (with consent), declarations of consent and information about third parties.

**Contract data:** Data that arises in the context of the provision of our services and the conclusion of contracts, such as contractual services, data relating to the provision of services, data on how you envisage our services (specifications, preferences, etc.), data from the run-up to the conclusion of the contract, information on processing (e.g. invoicing) or financial data.

**Applicant data:** Data that is generated as part of an application for a job with us, such as professional background, references and data from public sources (e.g. the Internet), in particular also information on criminal convictions and bans on employment / occupation.

**Technical data:** Data that is generated in the context of the use of our offers (e.g. website), such as IP address, geographical information and the time of use.

**Communication data:** Data that is generated in connection with communication between us and third parties (e.g. by email, telephone, video call, messaging services, letter or other means of communication), such as the content of emails or letters, your contact details and marginal data of the communication.

**Behavioural data:** Data about your behaviour and preferences, such as presence, absence (reasons for this - including health-related), responses to communications, navigation on the website, interactions with our social media profiles, participation in events, supplemented with information from third parties (including from publicly available sources) where applicable.

**Other data:** In particular, data that arises in connection with official or judicial proceedings, data that is collected due to health protection, photos, video or sound recordings that we produce or receive from third parties and on which you are recognisable.

### **3.2. The purposes for which we process data**

#### **Provision of our services:**

**Communication:** In order to be able to communicate with you, we process your data. This may also take place via electronic channels and in particular via e-mail and video calls.

**Contracts:** We process personal data in connection with the conclusion or execution of contracts (e.g. with you or you as a person with parental authority). This also includes the enforcement of legal claims arising from contracts (e.g. legal proceedings), their termination, accounting and the implementation of application processes.

**Marketing and relationship management:** We process data for marketing purposes and relationship management, e.g. to send our customers, contractual partners and interested parties personalised advertising or news (e.g. by email or in print). You can refuse or revoke such contacts.

**Organisation of events:** We organise events with participants. Data must be processed for this purpose, in particular to invite people, look after them and send them information (retrospectively) if necessary.

**Improving our services and operations:** In order to continuously improve our services (including our website), we analyse, for example, how you behave on our website.

**Registration:** In order to use certain services (e.g. newsletters, login areas), you must register directly with us or via external service providers, for which we process data.

**Compliance with laws, directives and recommendations from authorities.** We may process personal data as part of compliance with the law (e.g. tax obligations, health concepts). In addition, data may be processed in the course of investigations (e.g. by a law enforcement agency or an authorised private body).

**Other purposes:** These include, for example, training and education purposes, risk management, corporate governance, administrative purposes (e.g. the management of master data or accounting),

corporate development, the protection of our rights and the evaluation and improvement of internal processes, the protection of other legitimate interests and others.

#### **4. Where the data comes from**

**From you:** You provide us with much of the data yourself (e.g. in connection with our services). With some exceptions (e.g. legal obligations), you are not obliged to disclose your data. However, if you wish to use our services, for example, you must provide us with certain data. In the event that the GDPR applies, the legal basis for this is Art. 13 GDPR, otherwise the Swiss Data Protection Act applies.

**From third parties:** We may also obtain data from publicly accessible sources (e.g. debt collection registers, Internet incl. social media) or receive it from authorities (e.g. supervisory authorities, courts), your employer who has a business relationship with us or is otherwise involved with us and from other third parties (e.g. associations). In the event that the GDPR applies, the legal basis for this is Art. 14 GDPR, otherwise the Swiss Data Protection Act applies.

#### **5. To whom we disclose your data**

Only in connection with our contracts, the website, our services, our legal obligations or otherwise to safeguard our legitimate interests and the other purposes listed in Section 3 will we also transfer your personal data to third parties, in particular to:

**Service providers:** We work with service providers in Switzerland and abroad who process data (i) on our behalf, (ii) under joint responsibility with us or (iii) under their own responsibility (e.g. cloud storage and collaboration services, accommodation providers, communication and messaging service providers, IT providers, banks, insurance companies, accounting services). This may also include health data.

**Contractual partners:** This refers to customers who obtain a service from us and other contractual partners of ours, where the transfer of your data results from the contract. The recipients process the data under their own responsibility.

**Authorities:** We may disclose personal data to offices, courts and other authorities (e.g. municipalities, supervisory authorities) in Switzerland and abroad if we are legally obliged or authorised to do so or if this appears necessary to protect our interests.

**Other persons:** This refers to other cases where the involvement of third parties arises from the purposes set out in section 3. As part of our corporate development, we may sell or acquire businesses, assets or companies or enter into partnerships, which may also result in the disclosure of data to the persons involved in these transactions. In the course of communication with our competitors, industry organisations, associations and other bodies, data may also be exchanged that may affect you.

All these categories of recipients may in turn involve third parties, so that your data may also become accessible to them.

If the above-mentioned external service providers act as data processors, we have concluded a data processing agreement with them.

In other cases, such as the publication of images on our website, we will obtain your consent.

#### **6. Data erasure and storage duration**

In the event that the GDPR applies, we adhere to the principles of data minimisation pursuant to Art. 5 para. 1 lit. c GDPR and storage limitation pursuant to Art. 5 para. 1 lit. e GDPR. In any case, we only store your personal data for as long as is necessary to achieve the purposes stated here or as provided

for by the retention periods stipulated by law. After the respective purpose no longer applies or after these retention periods have expired, the corresponding data will be deleted as quickly as possible.

## **7. Your rights**

In particular, you can request information about the processing of your personal data, have incorrect personal data corrected, object to data processing, request the disclosure of certain personal data in a commonly used electronic format or its transfer to other data controllers or revoke your consent if our processing is based on your consent.

### **7.1. Rights under the DSG**

In accordance with Chapter 4 of the FADP, you can request information about the processing of your personal data, have incorrect personal data corrected, object to data processing, request the disclosure of certain personal data in a commonly used electronic format or its transfer to another controller, or revoke your consent if our processing is based on your consent.

Every data subject also has the right to enforce their claims in court or to lodge a complaint with the competent data protection authority.

Please note that conditions, exceptions or restrictions apply to these rights (e.g. to protect third parties or business secrets).

### **7.2. Rights under the GDPR**

In the event that the personal data of EU citizens is processed, you have the possibility to assert various rights under the GDPR. The rights of data subjects arising from the GDPR are the right of access (Article 15), the right to rectification (Article 16), the right to erasure (Article 17), the right to restriction of processing (Article 18), the right to object (Article 21), the right to lodge a complaint with a supervisory authority and the right to data portability (Article 20).

#### **Right of cancellation:**

Some data processing can only take place with your express consent. You have the option to withdraw your consent at any time. However, this does not affect the legality of data processing up to the point of revocation.

#### **Right of objection:**

If the processing is based on Art. 6 para. 1 lit. e or f GDPR, you as the data subject can object to the processing of your personal data at any time for reasons arising from your particular situation. You also have this right in the case of profiling based on these provisions within the meaning of Art. 4(4) GDPR. If we cannot demonstrate a legitimate interest in the processing that outweighs your interests, rights and freedoms or if processing serves the assertion, exercise or defence of legal claims, we will refrain from processing your data after the objection has been made.

If the processing of personal data serves the purpose of direct marketing, you also have the right to object to this at any time. The same applies to profiling in connection with direct advertising. Here too, we will no longer process personal data as soon as you object.

#### **Right to lodge a complaint with a supervisory authority:**

If you believe that the processing of personal data concerning you infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, without prejudice to any other administrative or judicial remedy.

### **Right to data portability:**

If your data is processed automatically on the basis of consent or fulfilment of a contract, you have the right to receive this data in a structured, commonly used and machine-readable format. You also have the right to request the transfer and provision of the data to another controller, insofar as this is technically feasible.

### **Right of access, rectification and erasure:**

You have the right to obtain information about your processed personal data with regard to the purpose of the data processing, the categories, the recipients and the duration of storage. If you have any questions on this topic or other topics relating to personal data, you can of course contact us using the contact details provided in the legal notice.

### **Right to restriction of processing:**

You can request the restriction of the processing of your personal data at any time. To do so, you must fulfil one of the following requirements:

- You contest the accuracy of the personal data. You have the right to request a restriction of processing for the duration of the verification of accuracy.
- If the processing is unlawful, you can request the restriction of the use of the data as an alternative to erasure.
- If we no longer need your personal data for the purposes of processing, but you need the data for the establishment, exercise or defence of legal claims, you can request the restriction of processing as an alternative to erasure.
- If you object to the processing pursuant to Art. 21 (1) GDPR, your interests and ours will be weighed up. Until this balancing has taken place, you have the right to request the restriction of processing.

Restriction of processing means that, with the exception of storage, personal data may only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

## **8. Data transfer abroad**

We process and store personal data mainly in Switzerland and the European Economic Area (EEA), but in exceptional cases - for example via sub-processors of our service providers - potentially in any country in the world.

If a recipient is located in a country without adequate statutory data protection, we contractually oblige the recipient to comply with the applicable data protection law, e.g. through the EU standard contractual clauses. An exception may apply in particular in the case of legal proceedings abroad, but also in cases of overriding public interests or if the fulfilment of a contract requires such disclosure, if you have given your consent or if the data in question has been made generally accessible by you and you have not objected to its processing.

## **9. How we protect your data**

We take appropriate security measures of a technical and organisational nature to protect the security of your personal data, to protect it against unauthorised or unlawful processing and to counteract the risk of loss, unintentional modification, unwanted disclosure or unauthorised access. However, we cannot rule out data security breaches with absolute certainty; certain residual risks are unavoidable.

This site uses SSL or TLS encryption for security reasons and to protect the transmission of confidential content that you send to us as the site operator. You can recognise an encrypted connection by the fact that the address line of the browser changes from http:// to https:// and by the lock symbol in your

browser line. If SSL or TLS encryption is activated, the data you transmit to us cannot be read by third parties.

## **10. How we transmit data**

When data is transmitted (e.g. using a contact form provided or by e-mail), neither confidential nor reliable data transmission can be guaranteed. As a rule, we also respond to such contacts electronically. However, neither the confidentiality nor the integrity of the transmitted data can be guaranteed.

Therefore, no confidential data should be transmitted electronically. Exceptions to this are Internet offers where explicit reference is made to secure data transmission.

## **11. How we process data from our website and digital services**

When using our website (including newsletters and other digital offers), data is collected and stored. We may also use **cookies** and similar technologies to recognise website visitors and identify preferences. Technical data can be linked to personal data and thus possibly to you personally. You can set your browser so that it automatically rejects, accepts or deletes cookies (small files).

We also use **social media plug-ins**, which are small pieces of software that establish a connection between your visit to our website and a third-party provider. The social media plug-in informs the third-party provider that you have visited our website and may send the third-party provider cookies that it has previously placed on your web browser. For more information on how these third-party providers use your personal data collected via their social media plug-ins, please refer to their respective privacy notices.

We also use our own **tools and third-party services** (which in turn may use cookies) on our website, in particular to improve our website (e.g. integration of videos or maps), compile statistics and place adverts.

Some of the third-party providers we use may be located outside Switzerland. Information on the disclosure of data abroad can be found in section 8.

## **12. External links**

This website may contain links to third-party websites or to other websites under our responsibility. If you follow a link to a website outside our responsibility, please note that these websites have their own data protection information. We accept no responsibility or liability for these third-party websites and their data protection notices. Therefore, before using these websites, please check whether you agree with their data protection declarations.

You can recognise external links either by the fact that they are displayed in a different colour from the rest of the text or underlined. Your cursor will show you external links when you move it over such a link. Only when you click on an external link will your personal data be transferred to the destination of the link. In particular, the operator of the other website receives your IP address, the time at which you clicked on the link, the page on which you clicked on the link and other information that you can find in the data protection information of the respective provider.

Please also note that individual links may lead to a data transfer outside the European Economic Area. This could give foreign authorities access to your data. You may not have any legal remedies against this data access. If you do not want your personal data to be transferred to the link destination or even exposed to unwanted access by foreign authorities, please do not click on any links.

## **13. Hosting**

Register S.p.A, viale della Giovine Italia 17, 50122 Florence, Italy



When you visit our website, we automatically collect and store information in so-called server log files. Your browser automatically transmits this information to our server or to the server of our hosting company.

These are:

- IP address of the website visitor's end device
- Device used
- Host name of the accessing computer
- Operating system of the visitor
- Browser type and version
- Name of the retrieved file
- Time of the server request
- Amount of data
- Information on whether the retrieval of the data was successful

This data is not merged with other data sources.

Instead of operating this website on our own server, we can also have it operated on the server of an external service provider (hosting company), which we have named above in this case. The personal data collected by this website will then be stored on the hosting company's servers. In addition to the data mentioned above, the web host also stores contact requests, contact data, names, website access data, meta and communication data, contract data and other data generated via a website for us, for example.

The legal basis for the processing of this data is Art. 6 para. 1 lit. f GDPR. Our legitimate interest is the technically error-free presentation and optimisation of this website. If the website is accessed in order to enter into contractual negotiations with us or to conclude a contract, another legal basis is Art. 6 para. 1 lit. b GDPR. In the event that we have commissioned a hosting company, there is an order processing contract with this service provider.

#### **14. Use of local storage items, session storage items and cookies**

Our website uses local storage items, session storage items and/or cookies. Local storage is a mechanism that enables the storage of data within the browser on your end device. This data usually contains user preferences, such as the "day" or "night" mode of a website, and is retained until you delete the data manually. Session storage is very similar to local storage, whereas the storage period only lasts during the current session, i.e. until the current tab is closed. The session storage items are then deleted from your end device. Cookies are information that a web server (server that provides web content) stores on your end device in order to be able to identify this end device. They are either stored temporarily for the duration of a session (session cookies) and deleted at the end of your visit to a website or permanently (permanent cookies) on your end device until you delete them yourself or they are automatically deleted by your web browser.

These objects may also be stored on your device by third-party companies when you visit our website (third-party requests). This enables us as the operator and you as a visitor to this website to utilise certain third-party services that are installed on this website. Examples of this include the processing of payment services or the display of videos.

These mechanisms can be used in a variety of ways. They can improve the functionality of a website, control shopping basket functions, increase the security and convenience of website use and carry out analyses of visitor flows and behaviour. Depending on the individual functions, they must be categorised under data protection law. If they are necessary for the operation of the website and intended to provide certain functions (shopping basket function) or serve to optimise the website (e.g.

cookies to measure visitor behaviour), they are used on the basis of Art. 6 para. 1 lit. f GDPR. As the website operator, we have a legitimate interest in the storage of local storage items, session storage items and cookies for the technically error-free and optimised provision of our services. In all other cases, local storage items, session storage items and cookies are only stored with your express consent (Art. 6 para. 1 lit. a GDPR).

If local storage items, session storage or cookies are used by third-party companies or for analysis purposes, we will inform you about this separately in this data protection notice. Your required consent will be requested and can be revoked at any time.

## **15. Use of external service providers**

External services are used on our website. External services are services from third-party providers that are used on our website. This can be done for various reasons, for example for embedding videos or for the security of the website. When using these services, personal data is also passed on to the respective providers of these external services. If we do not have a legitimate interest in the use of these services, we will obtain your consent as a visitor to our website, which can be revoked at any time, before using them (Art. 6 para. 1 lit. a GDPR).

### **Analytics**

We process the personal data of website visitors in order to analyse user behaviour. By analysing the data obtained, we are able to compile information about the use of the individual components of our website. This enables us to increase the user-friendliness of our website. The analysis tools used can be used, for example, to create user profiles for the display of targeted or interest-based advertising messages, to recognise our website visitors the next time they visit our website, to measure their click/scroll behaviour, their downloads, to create heat maps, to recognise page views, to measure the duration of visits or bounce rates and to trace the origin of website visitors (city, country, which page the visitor comes from). The analysis tools help us to improve our market research and marketing activities.

Processing will only take place if you consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent (Art. 6 para. 1 lit. a GDPR). Without your consent, data will not be processed in the manner described above. If you withdraw your consent (e.g. via the consent banner or other options provided on this website), we will terminate this data processing. This does not affect the legality of the processing carried out up to the point of withdrawal.

#### **15.1. Google Analytics**

We use the Google Analytics service on our website. The provider of the service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of the service may result in data being transferred to a third country (USA). The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

Further information can be found in the provider's data protection information at the following URL: <https://policies.google.com/privacy>.

## **15.2. Microsoft Advertising Web Analytics**

We use the Microsoft Advertising Web Analytics service on our website. The provider of the service is Microsoft Ireland Operations Limited, One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, D18 P521, Ireland.

The use of the service may result in data being transferred to a third country (USA). The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

Further information can be found in the provider's data protection information at the following URL: <https://privacy.microsoft.com/de-de/privacystatement>.

## **16. Interface software**

Business processes are cheaper, faster and more error-free if they are automated with the help of software via interfaces. This allows them to be efficiently integrated into company processes via your own website or social networks. We use interface software on our website to link different applications with each other and to transfer personal data securely from one application to another.

Processing will only take place if you consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent (Art. 6 para. 1 lit. a GDPR). Without your consent, data will not be processed in the manner described above. If you withdraw your consent (e.g. via the consent banner or other options provided on this website), we will terminate this data processing. This does not affect the legality of the processing carried out up to the point of withdrawal.

### **16.1. Google Tag Manager**

We use the Google Tag Manager service on our website. The provider of the service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of the service may result in data being transferred to a third country (USA). The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

Further information can be found in the provider's data protection information at the following URL: <https://policies.google.com/privacy>.

## **17. Software framework**

Software frameworks facilitate interaction with a platform by creating a standardised interface to it. Frameworks are used to reduce the development effort for recurring software requirements and to ensure the reusability of code and functions. Some software frameworks implement security features to prevent improper use of the website. Software frameworks can increase functionality, accessibility, security and performance with little effort. Other areas of application can also be covered with software frameworks.

Processing will only take place if you consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent (Art. 6 para. 1 lit. a GDPR). Without your consent, data will not be processed in the manner described above. If you withdraw your consent (e.g. via the consent banner or other options provided on this website), we will terminate this data processing. This does not affect the legality of the processing carried out up to the point of withdrawal.

### **17.1. PHP.net**

We use the PHP.net service on our website. The provider of the service is The PHP Group, 1400 Parkmoor Ave, Ste 100, San Jose, California, 95126, USA.

As this service is hosted locally on the web server, there is no data transfer to third parties.

We base this processing on a legitimate interest (Art. 6 para. 1 lit. f GDPR).

This application is required to ensure the unrestricted functionality of the website.

### **17.2. Web fonts**

This site uses so-called web fonts for the standardised display of fonts, which are provided by an external provider and are loaded by the browser when the website is accessed. The provider of the web font becomes aware that our website has been accessed from your IP address, as your browser establishes a direct connection to the provider of the web font.

Processing will only take place if you consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent (Art. 6 para. 1 lit. a GDPR). Without your consent, data will not be processed in the manner described above. If you withdraw your consent (e.g. via the consent banner or other options provided on this website), we will terminate this data processing. This does not affect the legality of the processing carried out up to the point of withdrawal.

### **17.3. Font Awesome**

We use the Font Awesome service on our website. The provider of the service is Fonticons Inc, 307 S Main St Bentonville, Arkansas 72712, USA.

By using the service, data may be transferred to a third country (USA).

Further information can be found in the provider's data protection information at the following URL: <https://fontawesome.com/privacy>.

### **17.4. Google Fonts**

We use the Google Fonts service on our website. The provider of the service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of the service may result in data being transferred to a third country (USA). The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

Further information can be found in the provider's data protection information at the following URL: <https://policies.google.com/privacy>.

## **18. Advertising**

Tools are used on our website that facilitate or enable the placement of advertisements and the evaluation of the success of ads placed. Personal data is processed for this purpose, in particular the IP address, access times and device information.

Processing will only take place if you consent to this data processing (via our consent banner on the website). The legal basis for this processing is consent (Art. 6 para. 1 lit. a GDPR). Without your consent, data will not be processed in the manner described above. If you withdraw your consent (e.g. via the consent banner or other options provided on this website), we will terminate this data processing. This does not affect the legality of the processing carried out up to the point of withdrawal.

### **18.1. Google Ads**

We use the Google Ads service on our website. The provider of the service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of the service may result in data being transferred to a third country (USA). The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

Further information can be found in the provider's data protection information at the following URL: <https://policies.google.com/privacy>.

### **18.2. Google Double Click**

We use the Google Double Click service on our website. The provider of this service is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The use of the service may result in data being transferred to a third country (USA). The provider is certified in accordance with the EU-U.S. Data Privacy Framework and therefore offers an appropriate level of data protection.

Further information can be found in the provider's data protection information at the following URL: <https://policies.google.com/privacy>.

## **19. How we process data from social networks**

If you have given us your consent in accordance with Art. 6 para. 1 lit. a in conjunction with Art. 7 GDPR, we will process data about you on Facebook, X and YouTube. The providers of the platforms can also analyse your use. They also process this data for their own purposes and act as their own controllers for this purpose. For further information on processing by the platform operators, please refer to the data protection notices of the respective platforms.

## **20. Adjustments to the privacy policy**

This privacy policy is not part of a contract. We may amend it at any time. The version published on this website is the current version.