

## **INFORMATION ON CAMERA SURVEILLANCE 05/2022**

### **Personal data controller**

SkiStar AB (publ), Reg. No. 556093-6949, 780 91 Sälen, Sweden (hereinafter referred to as "SkiStar" or "we").

### **1 WHY DO WE USE CAMERA SURVEILLANCE?**

SkiStar uses camera surveillance to prevent, detect and investigate criminal acts in buildings in which it operates and to protect staff, visitors and the company's property from crime and accidents.

### **2 WHAT TYPE OF CAMERA SURVEILLANCE DO WE USE AND ON WHAT LEGAL BASIS?**

#### **Aim and purpose of surveillance and recording on SkiStar sites**

The purpose of surveillance and recording on SkiStar sites is to maintain a safe environment for staff and visitors and to prevent criminal activities such as theft and damage.

Camera surveillance supports the company's work to prevent serious incidents that pose a threat to people or property, and assists with the investigation of crimes such as damage, theft or threatening behaviour and violence. It also prevents unauthorised persons from entering the properties. The recorded material is sent to the camera alarm centre and the security company to assist with decisions on the need for intervention. Material sent directly to the security company or camera alarm centre is deleted as soon as the matter has been dealt with.

**Legal basis:** Camera surveillance is based on a balancing of interests. There is a legitimate interest in processing the data for the specified purposes.

#### **Categories of personal data**

Recordings of movements in the places where the cameras have been installed for the purposes specified above. SkiStar does not sell or provide any data; however, data may be processed by data processors, i.e. companies engaged by SkiStar for security and surveillance and to operate camera surveillance systems. However, these parties may not use the data for any purpose other than to provide the services for which they are engaged by SkiStar and only under the terms specified by SkiStar.

### **3 WHERE IS CAMERA SURVEILLANCE USED?**

SkiStar uses camera surveillance for the following:

1. Surveillance of shops (SkiStarshops and Concept Stores)
2. Surveillance of public areas (reception areas, lodges, hotels, etc.)
3. Surveillance of special areas (storage and luggage areas, etc.)
4. Surveillance of check-in stations (Livion key boxes)
5. Surveillance of operations and activities (in relation to lifts, ski attractions, etc.)

In addition to this, we also use webcams in our business to provide our guests with an overview of our lift- and slope system. We believe that no personal data is processed by these webcams, since they are positioned in such a way that it is highly unlikely that individuals will be identifiable from the images.

Drones are used for marketing purposes and to inspect lifts and queueing systems; they are flown by SkiStar employees with drone passes. Here, too, we believe that no personal data is processed, since it is highly unlikely that individual who have not consented to the surveillance will be identifiable from the images.

### **4 WHO HAS ACCESS TO THE CAMERA SURVEILLANCE SYSTEM?**

Access to SkiStar's camera surveillance system is restricted to a group of authorised SkiStar staff and authorised staff of companies responsible for handling surveillance and managing SkiStar's camera surveillance system.

The data may also be processed by the police where there are legal reasons for doing so.

## **5 HOW LONG IS RECORDED MATERIAL STORED?**

Recorded material is usually stored for 72 hours, but material on specially protected objects may be stored for up to 30 days.

Recorded material is stored on dedicated servers with a high level of IT- and physical security, where access is limited to a small number of authorised people within the business area concerned.

### **Storing specific recordings and events**

Material may be saved for longer than stated above to comply with specific legal requirements or if it is evidence in ongoing legal procedures (e.g. a criminal complaint or ongoing police investigation). In such cases, the material will be deleted as soon as the requirement to store it ceases.

**Legal basis for extended storage period:** We process personal data on the basis of "legal obligation" when we store data and transmit it to the police as part of an ongoing criminal complaint or police investigation or when the data is the subject of specific legal requirements.

## **6 CAMERA SURVEILLANCE AND INDIVIDUAL RIGHTS**

SkiStar processes all personal data in accordance with the EU's General Data Protection Regulation (GDPR). The Swedish Authority for Privacy Protection (IMY) can be notified if the camera surveillance is still considered to infringe the rules of the GDPR; for more information see [here](#).

You are welcome to contact us at any time to obtain a copy of your personal data or to have it amended or deleted. For more information about your rights, see our [privacy policy](#).

## **7 CONTACT DETAILS**

If you have any questions or complaints about the handling of personal data in connection with SkiStar's camera surveillance, you are welcome to contact our security officer at [sakerhetsombud@skistar.com](mailto:sakerhetsombud@skistar.com). You can also write to us using the contact details below.

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Att: Customer support  
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