

## INFORMATION ON PROCESSING OF PERSONAL DATA FOR LODGING AND TIMESHARE OWNERS (VERSION 2024-12)

### Personal data controller

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SkiStar processes all personal data in accordance with EU data protection legislation, the General Data Protection Regulation (GDPR). SkiStar AB is responsible for the handling of the personal data we collect from you. SkiStar Norge AS, org.nr NO 977 107 520 MVA, is part of the SkiStar Group and processes your data when you are in contact with one of our Norwegian destinations. SkiStar AB and SkiStar AS thus have joint personal data responsibility for certain data we collect about you when you are in contact with a Norwegian destination, but SkiStar AB has overall responsibility for the entire group's operations and exercises a dominant influence over the group companies. SkiStar AB is your main contact for questions and to exercise your rights. However, what is stated in this information document is applied by all companies within the SkiStar Group.

### I.1 Personal data that may be processed when you are a lodging or timeshare owner.

When SkiStar processes personal data about you as a lodging or timeshare owner, it is primarily to manage the contractual relationship between us (e.g. to communicate with you about your lodging, pay compensation, manage owner bookings, etc.). SkiStar may collect and process personal data about you in our business relationship, directly with you or when entering into and maintaining a contract.

The categories of personal data SkiStar may process are:

- **Bank details** (e.g. bank, credit/debit card information, account number).
- **Booking details** (as an owner's booking) (e.g. guest information, fellow travellers, booking number, period, destination, products/activities you booked).
- **Financial information** (e.g. payment method, billing information, income, financial condition, shareholding).
- **Company information** (e.g. company name, personal/contact information)
- **Identity information** (e.g. name, customer number, personal number (used in specific cases and printed separately), date of birth, gender, nationality).
- **Comments/references/evaluation** (e.g. related to inspection/checks/comments e.g. related to objects, owners in the form of person/company))
- **Contact details** (e.g. e-mail address, postal/delivery address, telephone number).
- **Purchase details** (e.g. product/service details in the context of a rental)
- **Registration number** (vehicle)
- **System permissions** (e.g. access rights, user information)
- **Special information about the lodging property** (owner, address, timeshare, residents' association, etc.)
- **Timeshare owner information** (e.g. Identity information, Contact information)
- **Information provided by the lodging/timeshare owner** (e.g. responses to customer surveys, information in e-mail correspondence, chat, telephone)

SkiStar never collects more information about you than necessary.

### I.2 The purpose of personal data and the legal basis uses

The table below explains more about 1) the purpose for which we use your personal data (the purpose), 2) the categories of personal data we may use for each purpose, and whether we have obtained the data from you or another source, and 3) the legal basis on which we use your data. To read about when we delete your personal data, see section I.4.

1) Purposes of processing personal data	2) Types of personal data and where they come from (source)	3) Legal basis for processing under the GDPR
Administration of contractual relationship incl. accounts/payments to lodging owners/timeshare owners	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Bank details</li> <li>• Financial information</li> <li>• Company information</li> <li>• Identity information (including ID number)</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> <li>• System permissions</li> </ul>	SkiStar must be able to perform the agreement between SkiStar and the lodging/timeshare owner
Administration of the SkiStar customer register (register maintenance)	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> <li>• System permissions</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)
Management of apartments/cabins used for rent	<u>Data coming from you:</u> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information (including ID number)</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <u>Data coming from someone other than you:</u> SkiStar <ul style="list-style-type: none"> <li>• Booking Information</li> <li>• System permissions</li> </ul>	SkiStar must be able to perform the agreement between SkiStar and the lodging/timeshare owner

<p>Administration in connection with housing associations</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information (including ID number)</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> <li>• System permissions</li> </ul>	<p>SkiStar must be able to perform the agreement between SkiStar and the lodging/timeshare owner</p>
<p>Manage lodging/timeshare owner discounts and benefits</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Bank details</li> <li>• Financial information</li> <li>• Company information</li> <li>• Identity information (including ID number)</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>SkiStar must be able to perform the agreement between SkiStar and the lodging/timeshare owner</p>
<p>Manage statistics and other information</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>
<p>Accounting purposes (setting up financial reporting and reporting incl. audit)</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Purchase details</li> <li>• Special information about the lodging property</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	<p>to allow SkiStar to fulfil its legal obligations under corporate, share, securities and tax legislation</p>
<p>To prevent and deter criminal acts and other acts of a similar</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the</p>

nature (e.g. breaches of public conditions)	<ul style="list-style-type: none"> <li>• Identity information (including ID number)</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	data subject and the processing is necessary for the purpose)
Conduct customer surveys with SkiStar and our partners	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)
Conduct sales calls after you contact us and say you are interested in our service/product	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> </ul>	Consent (data subject has agreed to the processing)
Marketing of SkiStar's products and services	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)
Marketing of SkiStar and SkiStar's products/services	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Identity information</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)
Productivity and quality monitoring and resource planning for e.g. cleaning and property services	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul>	Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)
Reporting of sales, compensation, deductions and taxes and fees to the authorities	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Financial information</li> <li>• Purchase details</li> <li>• Special information about the lodging property</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> </ul>	to allow SkiStar to fulfil its legal obligations under corporate, share, securities and tax legislation

<p>System administration and permissions (passwords, login, key access, etc.)</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Company information</li> <li>• Identity information (including ID number)</li> <li>• Contact details</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• System permissions</li> </ul>	<p>SkiStar must be able to perform the agreement between SkiStar and the lodging/timeshare owner</p>
<p>Provide support, troubleshooting, improvement, ordering and other necessary handling of SkiStar's IT system and application-related matters</p>	<p><u>Data coming from you:</u></p> <ul style="list-style-type: none"> <li>• Bank details</li> <li>• Financial information</li> <li>• Company information</li> <li>• Identity information</li> <li>• Comments/references/evaluation</li> <li>• Contact details</li> <li>• Purchase details</li> <li>• Registration number</li> <li>• Special information about the lodging property</li> <li>• Timeshare owner information</li> <li>• Information provided by the lodging /timeshare owner</li> </ul> <p><u>Data coming from someone other than you:</u> SkiStar</p> <ul style="list-style-type: none"> <li>• Booking Information</li> <li>• System permissions</li> </ul>	<p>Balancing of interests (the interests of the controller outweigh the interests of the data subject and the processing is necessary for the purpose)</p>

With regard to the above purposes that SkiStar processes after balancing of interests, SkiStar has the following legitimate interests in processing the data:

- Manage and plan the work
- Marketing SkiStar's services and products
- Protect company employees and assets
- Contact and inform employees and business partners
- Achieve transparency towards shareholders and the public

### 1.3 Who may we share your personal data with?

Your personal data will be transferred or shared with SkiStar's central accounting functions and to a certain extent the IT function. Your personal data may also be disclosed to authorities or to system and service providers, partners, sub-suppliers such as cleaning and property management companies and auditors for specified purposes. In the event that SkiStar sells or buys operations or assets, SkiStar may also disclose your personal data to a potential seller or buyer of such activities or assets.

### 1.4 How long we store your personal data for

Personal data collected and processed to enable us to perform our contract with you will be processed for the duration of the contract and stored for a further 10 years after the termination of the contractual relationship. The data is retained primarily to comply with statute of limitations and also to comply with legal obligations, such as the Accounting Act and the Annual Accounts Act. In the event of complaints and disputes, we store the information for up to ten years in order to defend our interests in case of legal claims. Certain data, such as name, contact details and the like may also be processed for up to two years after the end of the contractual relationship, in order for SkiStar to be

able to contact the lodging/timeshare owner for potential future business. Data stored on the basis of our legitimate interest is stored on the basis of internally developed storage decisions and varies depending on processing.

### **1.5 Your rights**

You have the right to:

- Get access to your personal data. You can request a copy of the information you would like and verify the information we hold about you. A copy is free of charge to request.
- Obtain rectification of inaccurate or incomplete personal data.
- Get your data deleted in certain cases, for example if your personal data is no longer necessary for the purposes for which it was collected.
- Get a restriction on the processing of your personal data in certain cases – for example if you have objected to the processing of your personal data based on balancing of interests – while checking whether our reasons weigh up than your interests, rights and freedoms.
- Receive and transfer personal data to another data controller in certain cases (data portability).

You can contact our Security Officer (contact details as above) with any questions about the handling of personal data and your rights. To request access to your data, you can send an e-mail to [personuppgifter@skistar.com](mailto:personuppgifter@skistar.com) as we have a dedicated system for handling such requests.

### **1.6 Objection to processing**

You have the right to object to processing of your personal data based on a balancing of interests. Continuous processing of your personal data requires that we can show overriding legitimate reasons that weigh up than your interests, rights and freedoms, or if this is done in order to establish, exercise or defend legal claims.

### **1.7 Complaints**

Contact your contact person at SkiStar or our Security Officer in case of complaints regarding SkiStar's processing of personal data. You also have the right to file a complaint with the Privacy Authority or any other competent supervisory authority within the EU.