

INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA pursuant to art. 13 EU Regulation 2016/679

This information is provided by the Data Controller for the processing of personal data deriving from the containment and prevention measures of contagion from Coronavirus.

Data controller

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Data Protection officer

The Data Protection Officer appointed by the Data Controller can be contacted at the following email address:

dpo@campigliodolomiti.it

Purpose of the processing

The personal data described below will be processed by the Data Controller in order to implement the measures for the prevention and containment of the COVID-19 contagion, provided for by current legislation and by the anti-contagion security protocols as well as by the protocols envisaged for the reopening of activities. commercial, to protect the health of people who access the company premises and / or who use the services provided by the Data controller. In compliance with legal obligations, the data will be processed for the verification of possession of the standard or super Covid-19 Green Pass as defined in current legislation, as well as for the verification of the identity of the person holding the aforementioned certification.

In general, the treatments are also necessary in order to implement effective collaboration with public authorities and with all those involved in emergency management.

Legal basis

The aforementioned purposes are legally based in the following legal bases as:

- the processing is necessary for compliance with a legal obligation to which the data controller is subject, as required by art. 6 par. 1 letter c) of the 2016/679 EU Regulation;
- the processing is necessary in order to comply with the provisions of laws issued to manage the Covid-19 emergency;
- the processing is necessary for the pursuit of a public interest, specifically the protection of health and the containment of the infection;
- the processing is necessary for reasons of significant public interest on the basis of Union or Member State law, which must be proportionate to the purpose pursued, respect the essence of the right to data protection and provide for appropriate and specific measures to protect the fundamental rights and interests of the data subject - art. 9 par. 2 lett. g) Regulation (EU) 2016/679;
- the processing is necessary in order to comply with the provisions of art. 29 bis, of Law no. 40 (Law Decree no. 23 of 8 April 2020 converted with amendments by Law no. 40 of 5 June 2020), which provides "1. With the aim of protection against the risk of Covid-19 infection, public and private employers fulfil the requirement established by Article 2087 of the Italian Civil Code through implementation of the provisions contained in the shared protocol regulating measures for the contrast and containment of the spread of Covid-19 in the workplace, signed on 24 April 2020 between the Government and the social partners, as amended, and in other protocols and guidelines as indicated in Article 1, paragraph 14 of Italian Decree-Law no. 33 of 16 May 2020, as well as through adoption and maintenance of the measures set out therein. Where the aforementioned provisions are not applicable, the measures shall apply contained in the sector protocols

or agreements established by the trade-union and employer organisations that are most relevant at the national level.” as well as for compliance with national and provincial legislation in force from time to time;

- the processing is necessary in order to comply with the "Guidelines for the resumption of economic and social activities" adopted by the Conference of Regions and Autonomous Provinces
- in general, the data will be processed in compliance with the various provisions relating to the management of the emergency from Covid-19 in force from time to time.

Nature of the data processed

For the pursuit of the purposes described above, the following data may be processed:

- status of validity of the standard Covid-19 Green Pass in the manner prescribed by law (name, surname, date of birth, outcome of verification of the standard Covid-19 Green Pass) and identity of the person holding the certificate;
- identification and contact data (name / surname / telephone or email) of the people present and / or who made the booking;
- any body temperature measurement carried out before entering the company premises and / or for the use of the services provided by the data controller;
- information elements that indicate the absence of risk factors for contagion from Covid-19, such as data relating to the state of health (body temperature level below the threshold of 37.5; the absence of flu symptoms), origin from areas at epidemiological risk; the absence of contacts, in the last 14 days, with subjects who tested positive for COVID-19.

Method of checking Green Pass

The Green Pass must simply be shown at the entrance by individuals who want to access the company buildings (hereinafter “**Customer**”) and must be scanned by those appointed to the task exclusively using the specific Covid-19 Verification App provided by the Government, which is used to scan the QR code of the Green Pass, following selection of the type of check from those available on the app (Standard or Super, depending on the type of business of the Data Controller).

Scanning of the Green Pass QR code, with the Standard version of the check, only provides the user performing the check with a positive / negative response: the document holder either does or does not have a valid Green Pass, without any reference to the basis for issue of the Green Pass (vaccine, recovery from Covid-19 or test) nor to its date of expiry.

Scanning of the Green Pass QR code, with the Super version of the check, only provides the user performing the check with a positive / negative response: the document holder either does or does not have a valid Green Pass, without any reference to the basis for issue of the Green Pass (vaccine or recovery from Covid-19) nor to its date of expiry.

If the check with the app gives a positive response, entry is authorised. If the check gives a negative response, entry is refused.

If there are any doubts regarding correspondence of the data (name, surname and date of birth) shown on the app and those presented by the **Customer** (e.g. different age) or in the event of any doubt on the part of the person performing the check regarding the identity of the **Customer**, the **Customer** will be asked to show their ID.

The Green Pass is not requested:

- for individuals outside the age range for the vaccine roll-out (under 12).
- for individuals excluded from the vaccine roll-out on the basis of appropriate medical certification issued in line with the criteria established by the Italian Ministry of Health, which should be presented at the time of entry and checked by the appointed personnel.

Mandatory or optional nature of the provision

In case of refusal by the data subject to submit the data prescribed by law, it will not be possible to allow access to the premises and / or allow the use of the services for which the same provides for the obligation of prior verification of the certificate (differing depending on the type of business of the Data Controller) and identity of the holder. In general, failure to provide the data requested and described above may result in

the inability to use the services offered and / or organised by the Data Controller and / or access to the premises.

Data recipients

The personal data provided are processed by the employees of the data controller specifically authorized for this and / or by third parties who provide specific services or carry out activities connected, instrumental or supportive to those that are the subject of the functions of the data controller, with whom specific stipulated layers are contracts pursuant to art. 28 of EU Regulation 2016/679. The updated list of external data processors can be consulted at the offices of the Data Controller.

The data could be requested by the competent Authorities for the purpose of checking compliance with the obligations imposed by the legislation.

The data could be communicated or requested by the competent health authority for the purpose of safeguarding the health of the workplace, as well as to other public or private entities, as required by the legislation on the management of the COVID19 emergency.

Methods used to process personal data

In accordance with the provisions of art. 5 of the Regulation, the Personal Data subject to processing are:

- processed in a lawful, correct and transparent manner towards the data subject;
- collected and recorded for specific, explicit and legitimate purposes, and subsequently processed in terms compatible with these purposes;
- adequate, relevant and limited to what is necessary with respect to the purposes for which they are processed;
- accurate and, if necessary, updated;
- processed in such a way as to guarantee an adequate level of security;
- stored in a form that allows the identification of the data subject for a period of time not exceeding the achievement of the purposes for which they are processed.

The treatment will be carried out both with manual and / or IT and telematic tools with organizational and processing logics strictly related to the purposes themselves and in any case in such a way as to guarantee the security, integrity and confidentiality of the data in compliance with the organizational and physical measures and logic provided for by the provisions in force.

Data transfer abroad

For the purposes indicated above, the Personal Data will be processed within the European Economic Area (EEA). Should they be transferred to Third Countries, in the absence of an adequacy decision by the European Commission, the provisions of the applicable legislation on the transfer of Personal Data to third countries will be respected, such as the Standard Contractual Clauses provided by the European Commission.

Data retention

Unless otherwise provided for by current legislation, the data relating to the verification of the Covid-19 green certification will not be stored.

The other personal data indicated above will be kept until the end of the state of emergency provided for by the competent public authorities. The data relating to the list of individuals present in addition to the date of presence in the company premises and / or presence for the use of the services provided by the Data

Controller will be kept for a period of 14 days, unless the same must be kept for further purposes for which suitable information will be provided.

However, storage for a longer period in relation to requests from the public authority is reserved. The retention of personal data, including particular ones, is also reserved for a longer period, within the limitation period of the rights, in relation to needs related to the exercise of the right of defense in the event of disputes.

Automated decision making

Personal data are not subjected to processing processes that involve automated decisions without human intervention, including the profiling process.

Rights of the data subject

Articles 15 and following of EU Regulation 2016/679 grant the data subjects the exercise of specific rights. The art. 15 recognizes the right of data subjects to access their personal data and to obtain a copy thereof. The right to obtain a copy of the data must not affect the rights and freedoms of others.

With the request for access, the data subject has the right to obtain confirmation from the Data Controller whether or not their personal data is being processed and to know the purposes and categories of data processed, the third parties to whom the data are communicated, and if the data are transferred to a non-European country with adequate guarantees. The data subject also has the right to know the retention time of their personal data, with respect to the aforementioned purposes.

With respect to their personal data, the data subject has the right to request the rectification of inaccurate data and the integration of incomplete ones, cancellation (right to be forgotten) under the conditions indicated in art. 17, EU Regulation 2016/679, the opposition and limitation of processing.

To exercise the rights, the data subject can contact the Data Controller by writing to the addresses listed above.

Before providing an answer, the data controller may need to identify the data subject, by requesting to provide a copy of his identity document.

Written feedback will be provided without undue delay and, in any case, no later than one month from receipt of the request.

Complaint

In the event that the data subject believes that the processing of their personal data violates the provisions of EU Regulation 2016/679, they have the right to lodge a complaint with the Data Protection Authority, pursuant to art. 77 of the Regulation itself, as well as appealing to the judicial authorities.

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