

# PRIVACY POLICY

This Privacy Policy ("**Privacy Policy**") describes how KIRKENES SNOWHOTEL AS (company reg. No. 983 427 685 ) ("**KIRKENES SNOWHOTEL**", "**we**", "**us**"), process your Personal Data. "**Personal Data**" is any information with which one can, directly or indirectly, identify a physical person. Please read this Privacy Policy carefully to understand how and for what purposes we process your Personal Data.

We process your Personal Data when you use our services ("**Services**") as described below. We care about your privacy and comply with applicable law aiming to protect you as an individual. This Privacy Policy describes the foundation of how we process Personal Data you share with us or that we collect when you use the Services.

We aim to maintain a high level of protection of your integrity. KIRKENES SNOWHOTEL processes Personal Data mainly to administer, provide, develop and maintain the Services, handle your bookings, optimise your experience of the Services and to communicate with you.

If we make changes to this Privacy Policy, we will notify you. The means of notification varies depending on what Services you use and when. The new terms will always be published on KIRKENES SNOWHOTEL's website.

If you provide us with Personal Data concerning other persons, you are responsible for ensuring that KIRKENES SNOWHOTEL is allowed to process that Personal Data in accordance with this Privacy Policy.

## COLLECTION AND PROCESSING OF PERSONAL DATA

KIRKENES SNOWHOTEL only processes your Personal Data in accordance with applicable law.

KIRKENES SNOWHOTEL may collect Personal Data directly from you when you use the Service (for instance when you book a hotel room or activities). We may also receive and transfer your Personal Data from and to companies KIRKENES SNOWHOTEL or our partners (e.g. if you have used a travel agency / tour operator to book a hotel room). We may use different means to collect your Personal Data (for example bookings via tour operator, via Booking.com, via Expedia.com, direct booking etc. ) Depending on what Service you use the means of collecting and the purpose of processing may vary.

KIRKENES SNOWHOTEL will process your Personal Data for the purposes outlined below, and the purposes described to you when you use a specific

Service. When your consent is required by law in order for us to process your Personal Data, we will collect your consent prior to processing.

## WHAT PERSONAL DATA DO WE PROCESS AND WHY?

### Handle bookings

If you book a hotel room, meals, activities and transfers, with us, we will process your Personal Data in order to provide, handle, administer, follow up and obtain payment for your booking. This includes processing in order to remind you or inform you of your booking when you are to stay with us.

#### Personal Data

- Identity related data such as name
- Contact details such as e-mail address, telephone number, address
- Preferences and other requests or needs
- Sensitive personal data regarding for instance health (e.g. if you book room to guests needing assistance or no stairs)
- Other data you provide when making your booking (e.g. regarding persons you travel with)

#### Legal basis for processing

The processing is necessary in order for us to fulfill our agreement with you.

**Retention period:** Until you are our customer or until you object further processing

Processing based on KIRKENES SNOWHOTEL's legitimate interest

### Newsletter and other direct marketing, customer surveys

If you use our Services we may process your Personal Data in order to send you newsletters containing relevant information and offers about our services, through different information channels, such as post, e-mail or our other digital channels, as long as you are our customer. We may also send you customer surveys that give you the opportunity to influence the range of products and services we provide. Our processing of sending you direct marketing and customer surveys are based on our legitimate interest.

If you wish to no longer receive newsletters or other direct marketing from us, you can object to further processing by contacting us by email [info@snowhotelkirkenes.com](mailto:info@snowhotelkirkenes.com). If you object to our continued processing, your Personal Data will be deleted or anonymised (unless the Personal Data in question is also processed for other purposes) and you will no longer receive direct marketing from us.

**Personal Data**

- Identity related data such as name
- Contact details such as e-mail address, telephone number, address

**Legal basis for processing**

The processing is based on our legitimate interest of sending direct marketing and customer surveys.

**Retention period:** As long as you are our customer or before that if you object to further processing.

Processing based on legitimate interest of direct marketing and surveys

**Handling of customer service inquiries**

We may process your Personal Data in order to respond to, assist, follow up and handle your customer service inquiry. This includes communication necessary in order for us to respond to questions you have submitted to us via telephone, e-mail, social media or other communication channel. We may also process your Personal Data in order to handle complaints or support inquiries, including technical support.

**Personal Data**

- Identity related data such as name
- Booking data
- Contact details such as e-mail address, telephone number, address
- Technical data, e.g. about your IT equipment
- Sensitive personal data regarding for instance health (e.g. if you book room adapted to disabled guests)
- Receipt details, e.g. previous purchases
- Other Personal Data you provide as part of your inquiry

**Legal basis for processing**

The processing is based on our legitimate interest of handling customer service inquiries.

**Retention period:** Six months after the customer service inquiry has been closed in order to administer and to follow up on your inquiry.

**Development and assessment of our Services, products and systems**

We may process your Personal Data to adapt, develop and maintain our Services in order to improve user friendliness, product and Service range, quality and efficiency from an environmental and sustainability perspective. We may also process your Personal Data in order to diagnose errors, optimise technology and improve our IT systems (e.g. to ensure that KIRKENES SNOWHOTE's booking & IT systems are not used by unauthorised persons).

We analyse the data we collect about you, e.g. by means of our analytics tools on our website. The analysis is anonymised and is carried out in an aggregated form. The information from the analysis can never be connected

to a specific person. The analysis helps us develop our IT systems, website and product and Service range.

**Personal Data**

- Identity related data such as name
- Contact details such as e-mail address, telephone number, address
- Booking data
- Digital identifiers, e.g IP address
- Technical data, e.g. about your IT equipment

**Legal basis for processing**

The processing is based on our legitimate interest of being able to develop and improve our Services and products.

**Retention period:** Maximum 38 months from collection.

**Legal obligations**

We may also process your Personal Data if we are compelled to do so by law, court or public authority, e.g. to fulfil our obligations with regards to financial reporting, under tax law or due to a decision by the police department or other authority.

**Personal Data**

Identity related data such as name  
Payment data  
Booking data  
Contact details such as e-mail address, telephone number, address  
Receipt details, e.g. previous purchases

**Legal basis for processing**

Processing is based on legal obligations.

**Retention period:** In accordance with national law in respective country.

**Recruitment**

If you submit a job application (general or for a specific role) via our website or our other communication channels, we process your Personal Data in order to evaluate your application and recruit staff. This includes, if applicable, references and background checks if part of the recruitment process.

We kindly ask you not to send us any sensitive Personal Data (e.g. information revealing health conditions, race or ethnicity).

If you are offered and accept employment with us, some of the Personal Data we have collected during the recruitment process will form part of your employment contract.

## **Personal Data**

- Identity related data such as name
- Contact details such as e-mail address, telephone number, address
- Recruitment details, e.g. CV, personal letter
- Information regarding what role, area, country and type of employment you have applied for
- Sex, citizenship and nationality
- Grades, certificates, work experience, education or other information you voluntarily provide us with as part of your application

## **Legal basis for processing**

Processing is based on your application.

**Retention period:** Your application is saved throughout the entire recruitment process. If you are not offered a job with us we may save the information we have collected up to 24 months after the recruitment process has finished. General applications may be saved up to 12 months from submission, unless a recruitment process has been initiated.

## **FOR HOW LONG IS YOUR PERSONAL DATA RETAINED?**

Your Personal Data is retained as long as it is necessary in order for us to fulfill the purposes of our processing. Thereafter we will in a secure way delete or anonymise your Personal Data to the extent that it is no longer possible to identify you or know that the data relates to you. You will find a pre-defined retention period below each of the processing activities in the tables above.

KIRKENES SNOWHOTEL deletes Personal Data in accordance with applicable law and the criteria outlined above. This means that KIRKENES SNOWHOTEL deletes or anonymises your Personal Data when the Personal Data is no longer required for the purpose of processing.

## **TRANSFER OF PERSONAL DATA AND RECIPIENTS WITH WHOM WE SHARE INFORMATION**

We may share your Personal Data with third parties. As detailed above, your Personal data may be transferred to companies within and outside the EU/EEA that operate with KIRKENES SNOWHOTEL or to our suppliers related to fulfilling our services and obligations to you. We never sell your personal data and KIRKENES SNOWHOTEL will always enter into necessary data processing agreements with the companies that process your Personal Data

on our behalf; all to ensure an adequate security level for the processing of your Personal Data.

- **Suppliers**

We may, in order to fulfil the purposes with our processing of your Personal Data, use other companies to fulfil our obligations to you. To that end, we will share or transfer your Personal data with or to companies that provide services to KIRKENES SNOWHOTEL, including, but not limited to, our suppliers providing customer service, delivery services, analysing services, communication and marketing services. KIRKENES SNOWHOTEL may also share your Personal Data with our suppliers providing hosting, storage, technical support and maintenance of our IT solutions. Furthermore we may transfer your Personal Data to our payment service providers who provide us with payment solution services, in order to facilitate your payment to us. Our suppliers only process your Personal Data in accordance with our documented instructions and may not use your Personal Data for their own purposes. They are also required by law to protect your Personal Data from unauthorised access and similar.

- **Other recipients**

We may as the case may be transfer your Personal Data to other recipients than those outlined above if it is necessary in order for us to fulfil the purposes outlined in the table below.

<b>Repient</b>	<b>Purpose</b>	<b>Legal basis for transfer</b>
Public authorities	We transfer Personal Data to public authorities if we are required to do so by law.	The processing is necessary for compliance with a legal obligation to which we are subject.
Debt collectors	If you do not pay we may transfer your Personal Data to a debt collector agency in order to collect your debt owed to us.	The processing is necessary for our legitimate interest of receiving payment for Services rendered.
Courts, appellant/appellee, etc.	If there is a trial or similar, we may transfer your Personal Data to the court, public authority or appellant/appellee as the case may be, in order to protect our interests.	The processing is necessary for our legitimate interest of being able to defend ourselves or protect our interests.
Re-organisation, merger or acquisition	If KIRKENES SNOWHOTEL re-organises its organisation or for other reasons sells parts or the entirety of its business to a third party, your Personal Data may be transferred together with the business.	The processing is necessary in order to fulfil our legitimate interest of selling business, merger or acquisition.

# HOW ARE YOUR PERSONAL DATA PROTECTED?

KIRKENES SNOWHOTEL has implemented appropriate technical and organisational measures to protect your Personal Data against for instance loss, manipulation and unauthorised access. We continuously adapt our security to new technology in order to maintain high security levels.

## THIRD PARTY APPLICATIONS/WEBSITES

KIRKENES SNOWHOTEL services may contain links to other applications and/or websites over which KIRKENES SNOWHOTEL has no control. This Privacy Policy is only applicable to your use of KIRKENES SNOWHOTEL's own Services. KIRKENES SNOWHOTEL is not responsible for the content of any linked applications/websites and the processing of Personal Data that may be undertaken by the owner or operator of linked applications/websites.

## YOUR RIGHTS

Privacy law gives you several rights in relation to our processing of your Personal Data. If you would like to use your rights, please contact us by sending an e-mail to [info@snowhotelkirkenes.com](mailto:info@snowhotelkirkenes.com)

- **Access to your Personal Data**  
You have the right to obtain from us a confirmation as to whether we process your Personal Data, and where is the case, access to the Personal Data along with information about the processing and your associated rights, a so-called subject access request.
- **Request for rectification**  
If you think that certain Personal Data that we process concerning you is incorrect or incomplete, you have the right to request rectification. In order for us to change the Personal Data, you need to contact us by email [info@snowhotelkirkenes.com](mailto:info@snowhotelkirkenes.com). KIRKENES SNOWHOTEL is not responsible for problems caused by your Personal Data being incorrect if you have omitted to inform us thereof.
- **Withdrawal of consent with effect from the withdrawal and onwards**  
To the extent that we process your Personal Data based on your consent, you may at any point in time withdraw your consent to the processing. The withdrawal of your consent does not affect the lawfulness of processing based on consent prior to the withdrawal.
- **Objection to processing for the purpose of direct marketing**  
As mentioned above, you have the right to object to processing for the

purpose of direct marketing. You can contact us by email [info@snowhotelkirkenes.com](mailto:info@snowhotelkirkenes.com) .

- **Objection to certain processing activities**

You have the right to object to processing that is based on our legitimate interest, if you have personal reasons therefore. We may however continue to process your Personal Data if, even if you object thereto, we have compelling legitimate grounds for the processing that override your integrity interest.

- **Deletion**

You have the right to request that your Personal Data is deleted. This is not the case when it comes to Personal Data that we process due to law or an agreement with you.

- **Restriction of processing**

You have the right to request that the processing of your personal data is restricted. Please note that this may prevent us from providing you with all our Services.

- **Dataportability**

You have the right to receive a digital copy of your Personal Data that we process in a commonly used, structured and machine readable format (dataportability) to move to and use with another supplier. The right to dataportability, in difference to subject access right, only applies to the Personal Data that you have provided us with and that we process based on your consent or our fulfilment of an agreement with you.

- **Lodge a complaint with a supervisory authority**

If you are not happy with the way we process your Personal Data or if you for another reason believe that we have processed your Personal Data in an unlawful manner, you have the right to lodge a complaint with the supervisory authority responsible for data protection.

## WHO DO YOU CONTACT IF YOU HAVE QUESTIONS?

If you have any questions, comments or complains regarding our processing of your Personal Data our our compliance with the Privacy Policy and applicable privacy law, please feel free to contact us.

### Contact details

KIRKENES SNOWHOTEL AS

SANDNESDALEN 14

9910 BJØRNEVATN, KIRKENES, NORWAY

(visiting address & official & postal address)

Email [info@snowhotelkirkenes.com](mailto:info@snowhotelkirkenes.com)