

## PRINCIPLES OF PRIVACY AND PERSONAL DATA PROTECTION IN COMPANIES OF TMR GROUP

**GOPASS SE**, sídlo: Primátorská 296/38, Libeň, 180 00 Praha 8, IČO: 17107148, registered with Commercial Registry H 2546 vedená u Městského soudu v Praze, is, together with other in terms of property, personnel and otherwise associated companies, a joint data controller at personal data processing within TMR Group. TMR Group members are: Joint Controllers under the Joint Controllers Agreement entered into on 25. May 2018 and its subsequent amendments:

Main controller

**GOPASS SE**, sídlo: Primátorská 296/38, Libeň, 180 00 Praha 8, IČO: 17107148, registered with Commercial Registry H 2546 vedená u Městského soudu v Praze

Next controllers:

**Tatry mountain resorts, a.s.**

Demänovská Dolina 72, 031 01 Liptovský Mikuláš, ID: 31 560 636, VAT ID: SK2020428036

Registered in the Commercial Register maintained by the Žilina District Court, section: Sa, Insert no.: 62/L

**EUROCOM Investment, s.r.o.**

136, 034 83 Bešeňová, ID: 35 756 985, VAT ID: SK2021394969

Registered in the Commercial Register maintained by the Žilina District Court, section: s.r.o., Insert no.: 14558/L

**MELIDA, a.s.**

Špindlerův Mlýn 281, 543 51 Špindlerův Mlýn, Česká republika, ID: 241 66 511, VAT ID: CZ24166511

Registered in the Commercial Register maintained by the Court Hradci Králové, section: B, Insert no.: 3175

**SZCZYRKOWSKI OŚRODEK NARCIARSKI S.A.**

Narciarska 10, 43-370 Szczyrk Polsko, IČO/Regon: 072818322, Zápísaná v Krajowy rejester sadowy, Sad Rejonowy Bielsku-Białe, Registered in the Krajowy rejester sadowy, Sad Rejonowy Bielsku-Białe no. KRS: 0000140818

**SLASKIE WESOŁE MIASTECZKO SPÓŁKA Z OGRANICZONA ODPOWIEDZIALNOSCIA**

ul. PLAC ATRAKCJI, nr.1 , 41 501 Chorzow, Poland , ID/Region: 243516267, Registered in the Katowice-Wschod Regional Court in Katowice no. KRS: 0000499958

**MÖLLTALER GLETSCHERBAHNEN GMBH & CO KG & HOCHGEBIRGSBAHNEN ANKOGEL**

Talstation, Innerfragrant 46, 9831 Flattach, Firmenbuchnummer 19797p, Company reg. No.: FN 19797 p, VAT reg. No.: AT U33329902

**Muttereralm Bergbahnen Errichtungs GmbH**

Nockhofweg 40, 6162 Mutters, Austria, Firmenbuchnummer: 270746g, VAT reg. No.: ATU62238929

**Tatry mountain resorts CR, a.s.**

č.p. 75, 739 14 Ostravice, Česká republika, ID/Region: 06871917, Registered in: Spisová značka: B 23258 vedená u Městského soudu v Praze, VAT reg. No.: CZ06871917

**TMR Ještěd, a.s.**

Jablonecká 41/27, Liberec V-Kristiánov, 460 05 Liberec, Česká republika, ID/Regon: 06080413, Registered in: Spisová značka: B 2685 vedená u Krajského soudu v Ústí nad Labem, VAT reg. No.: CZ06080413

**Štrbské Pleso resort, s. r. o.**

K vodopádom 4028/26 059 85 Štrba, IČO: 55737854, Zápísaný v Obchodnom registri Okresného súdu Prešov, oddiel: Sro, vložka č. 46597/P

PRIVACY STATEMENT TMR Group - Customers

This Statement of Privacy applies to you and your personal data because you are a customer of an entity within the TMR Group. Our company acts as a data controller in the processing of your personal data. For the purposes of this privacy statement, the protection of your personal data is the responsibility of the TMR Group entity with which you have a contract, or you have membership in the loyalty program (controller).

This statement explains how we will use personal data we obtain from you or third parties (e.g., from a travel agency or your employer) during the term of your contractual relationship with TMR Group.

Scope of data	Purpose of processing	Recipients
<p><b>Contact personal data</b> For instance, your first name and surname, permanent address, address for sending writings, e-mail address, contact telephone number, GOPASS ID, date and time entering loyalty program, ordered service, service centre</p>	<p>Pre-registration in GOPASS loyalty program</p>	<p>Accommodation facilities Travel agencies Tour organizers Cortex, a.s. Pricewise, s.r.o.</p>
<p><b>Contact personal data</b> For instance, photo, your first name and surname, permanent address, address for sending writings, e-mail address, contact telephone number, GOPASS ID, date and time of registration confirmation, loyalty points, relation to other loyalty program members – type of account</p> <p><b>Access data</b> User access name and password</p> <p><b>Payment information</b> For instance, bank account number and the amount for paid services.</p>	<p>Registration in GOPASS loyalty program</p>	<p>TMR Group Cortex, a.s. Pricewise, s.r.o.</p>
<p>GOPASS ID, date and time of services, products, events purchasing, service centre</p> <p><b>Payment information</b> For instance, bank account number and the amount for paid services.</p>	<p>Product and services purchasing Purchasing of tickets for events (Tatra Dinner of Emotions, ratrack, Fresh Track, Dinner under the stars, etc.)</p>	<p>TMR Group Cortex, a.s. PriceWice, s.r.o.</p>
<p>GOPASS ID date and time of purchase of services, product, center name, Payment information. For example. bank account number and amount of charged services</p>	<p>Purchase of services and products of other operators through Gopass</p>	<p>Cortex, a.s. Resorts operated by other operators according to your choice</p>
<p>GOPASS ID and the use of discount points from the GOPASS loyalty program, Through documents such as fiscal receipt, GOPASS personal zone, you can verify the fulfilment of points.</p>	<p>Points transactions, using discounts</p>	<p>TMR Group Cortex, a.s. Pricewise, s.r.o.</p>
<p><b>Contact personal data</b> For instance, photo, your first name and surname, permanent address, address for sending writings, e-mail address, contact telephone number, GOPASS ID, date and time of registration confirmation, loyalty points,</p>	<p>Complaints and infolines</p>	<p>Tatry mountain resorts, a.s. Cortex, a.s. Pricewise, s.r.o.</p>

Scope of data	Purpose of processing	Recipients
<p>relation to other loyalty program members – type of account</p> <p><b>Payment information</b> For instance, bank account number and the amount for paid services.</p> <p><b>Special category of personal data</b> Confirmation of illness, incapacity for work, injury, etc. <b>But always only for viewing without retention.</b></p>		
<p>Photo and GOPASS ID, date and time of turnstile crossings</p>	<p>Protection against misuse of the service Checking non-portability and blocking the use of the service</p>	<p>TMR Group Centres</p>
<p>E-mail address, date and time of sending the Newsletter, check in the register of non-excluded recipients</p>	<p>Direct marketing - addressing with service offers and news in TMR Group operated facilities and centres</p>	<p>TMR Group Centres</p>
<p><b>Contact personal data</b> For instance, photo, your first name and surname, permanent address, address for sending writings, e-mail address, contact telephone number, GOPASS ID, date and time of registration confirmation, loyalty points, relation to other loyalty program members – type of account</p> <p><b>Payment information</b> For instance, bank account number and the amount for paid services.</p>	<p>Responding to data subjects rights requests</p>	<p>TMR Group Centres JUDICIUM, s.r.o.</p>
<p><b>Contact personal data</b> For instance, your first name and surname, permanent address, e-mail address, GOPASS ID, relation to other loyalty program members – type of account, used products and programs like slope kilometres, altitude difference, cableways used, etc.</p>	<p>Personalised marketing</p>	<p>TMR Group Centres Cortex, a.s. Pricewise, s.r.o.</p>
<p><b>Contact personal data</b> For instance, your first name and surname, permanent address, e-mail address, GOPASS ID, feedback on used products and services</p>	<p>Feedback</p>	<p>TMR Group Centres</p>
<p><b>Contact personal data</b> Identification of the donor and the recipient, together with the subject of the gift and donation to the donor, to the extent necessary to fulfil the purpose of processing, GOPASS ID, the value of the voucher</p>	<p>Gift vouchers Our company processes the personal data of the gift voucher holder to check the eligibility of services provided by the controller in the individual resorts of the</p>	<p>TMR Group Centres</p>

Scope of data	Purpose of processing	Recipients
	controller and / or to which the gift voucher is issued.	
Records of slope km in our resorts Jasná, Štrbské Pleso, Starý Smokovec, Tatranská Lomnica, Špindlerův Mlýn and Szczyrk, achieved level, friends who accepted the mutual comparison of statistics. When searching for friends, all applicants will see your data entered during registration in the extent of name, surname, city and photo (if you entered a photo of your face during registration), if applicants will search for you by name, surname and city, or by email address. However, always comparing the statistics in the extent of name, surname, city, photo, slope km, altitude difference, completed skiing days, selected level (goal you want to achieve during the season) and detail of turnstile crossings in the form of a graph for the current season, you must accept separately by special e-mail communication.	Ski challenge	Your statistics will be sent to you and your defined friends if they have accepted the sharing of statistics with you.
We may need to process your personal information in order to comply with the law (e.g., match of your name with the names on the so-called designated party lists and compliance with the money laundering law) or to comply with a court order	Legal cooperation and fulfillment of obligations	Only parties obliged by law.
We will process your personal data for this purpose to the extent necessary for the conduct and registration of the competition. It will be, for example, GOPASS ID, e-mail address, etc. The specification will always be described in the statute of the competition.	Marketing - consumer competitions	TMR Group Centres
Tester identification. In case of acceptance of the testing conditions and your personal interest, we will use the data and comments you have provided for the development of our company.	Testing for the Customer Experience	TMR Group

Purpose of processing	Legal basis	Retention period
Pre-registration in GOPASS loyalty program	Performance of a pre-contractual relationship in which the data subjects act as one of the contracting parties	10 days In the case of pre-registration through B2B partners as our intermediaries, it will be within 10 days, in the case of offline orders, your data will be processed for the duration of the order, which in

Purpose of processing	Legal basis	Retention period
		most cases means that we will retain your data for the duration of your relationship with us.
Registration in GOPASS loyalty program	Performance of a contractual relationship in which the data subjects act as one of the contracting parties	For the duration of membership in the loyalty program
Product and services purchasing Purchasing of tickets for events (Tatra Dinner of Emotions, ratrack, Fresh Track, Dinner under the stars, etc.)	Performance of a contractual relationship in which the data subjects act as one of the contracting parties Fulfillment of obligations arising from special regulations, especially tax and financial regulations	Current year and next 10 years
Points transactions, using discounts	Performance of a contractual relationship in which the data subjects act as one of the contracting parties Fulfillment of obligations arising from special regulations, especially tax and financial regulations	Current year and next 10 years
Complaints and infolines	Performance of a contractual relationship in which the data subjects act as one of the contracting parties Fulfillment of obligations arising from special regulations, in particular consumer protection rules	Current year and next 4 years
Protection against misuse of the service Checking non-portability and blocking the use of the service	Legitimate interest, which is to ensure the proper functioning and non-abuse of the service - ensuring the burden of proof in the event of a dispute. We verify your face photo when crossing the turnstiles in our facilities, especially ski resorts. This is the only possible way we can verify the non-abuse of our products, as we also have such customers. Tickets are sold as non-transferable and therefore we check their non-transferability.	Transitions through turnstiles. Your photos will be kept as follows: seasonal tickets for the whole season, as well as the GOPASS card, and short-term tickets for their validity and the next 30 days after the expiration date to provide information for resolving the complaint. When crossing the turnstiles, all photos are kept during the day and after 23:59:59 only the first and last photo from the passage through the turnstile of the previous day will be kept. If it is possible, we will erase your data even during your relationship with us as soon as they are not needed any more.

Purpose of processing	Legal basis	Retention period
Direct marketing - addressing with service offers and news in TMR Group operated facilities and centres	Legitimate interest, which is customer development and information about products and services	For the duration of membership in the loyalty program
Responding to data subject rights requests	Compliance with a legal obligation to which the controller is subject, in particular personal data protection regulation	5 years
Personalised marketing	Consent of the data subject	For the duration of consent
Feedback	Legitimate interest, which is to know the functioning and perception of TMR group and the GOPASS loyalty program	For the duration of membership in the loyalty program resp. until the moment of objecting to this form of addressing
Ski challenge.	Consent of the data subject. Withdrawal of consent is possible at any time by sending a request for withdrawal to info@gopass.sk	For the duration of membership in the Gopass program
Gift vouchers Our company processes the personal data of the gift voucher holder to check the eligibility of services provided by the controller in the individual resorts of the controller and /or to which the gift voucher is issued.	The legal basis is the contract concluded between us and the donor and the legitimate interest of our company together with the expectations of the recipient.	Personal data is processed for the time necessary to fulfill the purpose of processing - checking the eligibility of services provided by the controller in the individual resorts of the controller and / or for which the gift voucher is issued
Legal cooperation and fulfillment of obligations	Compliance with a legal obligation	According to the statutory deadlines.
Marketing - consumer competitions	The legal basis of the processing is the contract between us and you on the basis of which you accept the conditions of the competition and from which we both have rights and obligations.	12 months and in the case of a win, that will form a tax benefit, the current year and the next 10 years
Testing for the Customer Experience	Consent of the data subject..	12 months

**Location of your personal data** Your personal data will be stored exclusively within EU and EEA countries. During the transfer, we take care to maximize privacy protection by encrypting and using both software and hardware tools to secure the data being transferred. Your data may also be published through our communication channels and social media, but we will always let you know in advance, and you can object to such processing.

## RIGHTS OF THE DATA SUBJECTS

It is important for you to understand that those are your personal data we process and that we want you to be aware of the fact. Even if we do not need your consent to process your personal data, you have a lot of rights in connection with the processing of them.

**Right to access.** You can require to be informed how we process your personal data including the information about:

- the reason why we process your personal data
- what categories of personal data we process
- with whom we share your personal data
- how long we store your personal data or what criteria we exercise to determine the time limit
- what rights you have
- from where we obtain your personal data (if we have not obtained them from you)
- if processing includes automated decision-making (so called profiling)
- if your personal data have been transferred to a country outside EEA, how we ensure your personal data protection.

All the above-mentioned information is available in these Principles of the Personal Data Protection. You can also ask for a copy of your personal data which we process. However, additional copies will be chargeable.

**Right to remedy.** It is important for us to have accurate information about you and we request you to inform us if any of your personal data is incorrect, for instance, if you have changed your name or if you have moved.

**Right to erasure.** If we process your personal data in an illegal way, for instance, if we process them longer than it is necessary or if we do it groundlessly, you can ask us for their erasure.

**Right to restriction.** From the moment you have asked for remedy of your personal data, or if you have objected to the processing and until we can look into the problem or confirm the accuracy of your personal data (or change them according to your instructions), you are entitled to restricted processing. It means that we can process your personal data only in accordance with your consent (with the exception of their storage) if it is necessary in connection with legal claims to the protection of somebody else 's rights or if there exists a significant public interest in the processing. You can also require restriction of the processing of your personal data if the processing is illegal, but you do not want us to erase your personal data.

**Right to object.** If you suppose that we do not have the right to process your personal data, you can object to our processing. In such cases we can continue to process them only if we are able to prove persuasive legitimate reasons which prevail your interests, rights and freedoms. But we can always process your personal data if it is necessary for determination, exercise and defence of legal claims.

**Right to data portability.** You can demand your personal data, which you have provided us for processing based on your consent or for the contract performance, to be provided in structured commonly used and computer-readable format. You also have the right to require portability of the information to another data controller.

**Right to withdraw your consent.** You have the right to withdraw your consent and subsequently we will stop our processing activities based on this legal ground. We will also inform other parties to which we were allowed to provide your data about your request/requests.

In case of any doubts, you have the right to lodge a proposal for initiation of the procedure under section 100 of Act on personal data protection in the corresponding supervisory body. If you want to lodge a complaint about the way how we process your personal data, also in relation to the aforesaid rights, you can address our person who is responsible for the supervision of the personal data protection, that is the Data Protection Officer (DPO), and your complaints and requests will be inspected. The contact to our Data Protection Officer: [privacy@tmr.sk](mailto:privacy@tmr.sk).

If you are not satisfied with our reply or if you suspect that we process your personal data unfairly or illegally, you can complain to our Data Protection Officer and we will explain any discrepancies or you can contact the supervisory body which is the Office for Personal Data Protection. For further information about the Office for Personal Data Protection and their procedures how to lodge a complaint visit [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk).

In case of any further questions relating to the processing of your personal data, you can contact us via Data Protection Officer (DPO). Please, send your e-mail to the following address: [privacy@tmr.sk](mailto:privacy@tmr.sk).

More information on the processing of personal data can be found in the second layer of information on na [Principles of privacy 2 20230401 782.pdf](#)