# Privacy Policy: New Generation Austria GmbH

This document outlines how your personal information is used and stored by New Generation Austria GmbH, which trades as New Generation. This privacy notice is to let you know how entities that trade under the brand "New Generation" look after your personal information.

New Generation is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement. New Generation may change this policy from time to time and will alert you of any changes.

#### Last updated: 22 June 2020

#### Our promise to you

We promise:

- To store your data securely
- Never to pass it on or sell it without your consent
- To give you the opportunity to opt out from any, or all, marketing communications at any time.

#### What data we collect and store

We only store data necessary and relevant to enable us to deliver your booking, assist with your enquiry, and to improve our products and the customer experience we deliver. All the details of the data we collect and store can be seen in the table below.

#### How it is collected

We collect data in the following ways:

- While you are accessing our website, using cookies
- During the booking process, either online, over the phone, via email, or in person
- From third parties if the booking is made through a tour operator or agent
- When you talk to us on the phone or in person in-resort
- During your lesson
- In emails, text messages and in letters
- When you complete a survey or feedback
- If you take part in competitions

### How it is used

Relevant client data (names, ages, level information and discipline) is given to the instructor to enable them to deliver your lesson. Supplementary contact data and your buying history is available to the customer service and operations team to ensure we provide the best level of service possible and to reach you if need be regarding your lesson.

If you have chosen to receive marketing communications from us we will also use this data to provide you with information, news or offers, either by post or by email, which is relevant, interesting and useful to you. Your buying history and actions on our website, recorded via

cookies, is used to ensure that we provide a personalised experience, which matches your interests and meets your needs. We will never share this with third parties unless you have specifically consented to this.

We frequently review the products we offer to ensure that they provide awesome experiences to our clients. To enable us to do this, and to ensure our prices are fair, and reflect the value we offer, we may use your client data to assist in this review process. We may also use your buying behaviour to help us understand demand and to recruit and schedule instructors accordingly.

We want to ensure that our service provision is meeting or exceeding your expectations and so we will normally contact you via email following your lesson and may contact you sporadically from time to time to ask for your feedback. Your involvement in this process is of course wholly optional.

Type of information held	Detail	How it is used
Personal	Name and age (if supplied) or all skiers or boarders in the party	To allow us to personalise any communications we have with you including pre-arrival, during your stay in-resort, or following your return home. To ensure the lesson booked is appropriate and to enable us to pick the best instructor for you or your party.
Contact	Address, telephone number and email address of the lead booker.	To contact you in relation to your booking, if anything changes, or if we need to check any of the details. Address information is also required for online payments. To contact you from time to time with marketing communications, unless you have decided to opt out.
Ski/Board	Your chosen discipline and level.	To deliver an appropriate lesson. During the product review process. To understand demand and changes in the market, and to allow us to plan accordingly.
Transactional	Your booking history, including what you booked and when.	To deliver effective customer service, including contacting you to alert you of lesson availability which might be of interest to you. To enable us to send you relevant and interesting information in marketing

You can read all of the ways we might use your data in more detail in the table below.

		communications.
Locational	Data collected via our website and using cookies, including the device you have used and your location.	To help us understand what matters to you, and how you view content so we can ensure what we create meets those needs.
Behavioural	The types of lessons you bought and the frequency of purchase.	To help us during the product development process. To help us understand demand, so we can plan accordingly. To ensure the marketing communications we send you are relevant and interesting.
Communication	All written communications we receive from you, or summaries of spoken conversations.	To enable us to serve you effectively.
Consent	Whether you have consented to receiving marketing communications from us, and if so, in what format.	To ensure contact with you meets your requests.

# How it is processed

Your data might be used as part of the product development, financial and operational planning processes. We run regular sales reports to understand the frequency and volume of purchase by resort or by product type. This enables us to provide the best service possible.

To enable us to send personalised marketing communications your data will be used as part of the segmentation or profiling process. This might include your level, the resort you skied or boarded in, what you bought, how frequently you've bought and how or when you bought.

### Marketing communications

Unless you have chosen to opt out from marketing communications we will contact you by email, post or over the phone from time to time with information we think might interest or help you. This might include information about relevant products, services or offers, or news which we feel might interest you. On email this is likely to be around once a month. By post or phone it may be once a year or less. You can opt out from some, or all, of these communications at any time. The option to opt out will be provided at the time of booking and in all marketing emails. You can also contact us directly by phone or by email to opt out. Regardless of whether you choose to receive marketing communications or not we will still send you a booking confirmation via email, as well as a pre-arrival email, and an email inviting you to feedback on the service you received, after your lesson. This is to ensure safe and effective service delivery.

# Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

Your data is stored securely on our booking system which is hosted on Microsoft Azure Server (North Europe) in the Republic of Ireland. Only our database manager, those people who support the delivery of our lessons, and our sales and marketing team are given access to your data, with password protected logins. We never store card details. Any card information given over the phone is either input directly onto the system or destroyed after being entered. Any bookings made on paper in-resort are shredded the day of completion.

Our website has SSL (Secure Sockets Layer). This is the standard security technology for establishing an encrypted link between a web server and a browser. This link ensures that all data passed between the web server and browsers remain private and integral.

# How long it is stored

We retain data as long as you remain a customer. Once you stop buying from us we will store data for up to 6 years after your last purchase, after which point it will be destroyed. If you have not bought from us, but just enquired about lessons, we will only retain your data until the end of the winter season you enquired about. Unless you opted in to marketing communications.

We only retain data necessary to enable us to serve you effectively. So if, for example, you have opted out of marketing communications from us, we will delete your contact information once your booking has been delivered.

### Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. You can read our full cookie policy here.

### Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you

provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

# Your rights

Under GDPR you have the right to:

- Ask us about the data we store on you
- Amend or update the data we store on you
- Ask us not to process your data
- Opt out from any marketing communications at any time
- Ask us to delete or destroy any data we store on you

# Contact us

If you have any questions or concerns about this data policy, or the data we store on you, you can contact us: <u>info@skinewgen.com</u> or +44 (0)1462 674 000.