

PRIVACY POLICY SILBERCARD APP

GENERAL INFORMATION

This privacy policy informs users of the SILBERCARD-App (hereinafter referred to as „App“) about the type, scope and purposes of the collection and use of personal data by the silver region Karwendel Tourist Board (hereinafter referred to as „Operator“).

Personal data (e.g. name, e-mail address, telephone number) will only be processed and transmitted by the Operator in a lawful manner - in particular for the fulfilment of contractual obligations, due to legitimate prevailing interests of the Operator, or on the basis of consent given by the User.

If the legitimacy of a specific data processing is based on the User's consent, this can be revoked at any time (even in part) by sending an e-mail to v.kuenig@silberregion-karwendel.com. This may affect the functionality of the content offered on this App.

Furthermore, the User has the right to information about personal data concerning him/her, to data transferability, to correction or deletion of personal data and to restrict or object to the processing of personal data. The User may exercise the aforementioned rights by sending an e-mail to v.kuenig@silberregion-karwendel.com

Finally, the User has the right to lodge a complaint with the Austrian data protection authority (Wickenburggasse 8, 1080 Vienna, dsb@dsb.gv.at, www.dsb.gv.at), or with its competent supervisory authority pursuant to Art. 55 of the GDPR.

The Operator's data protection officer is Mr. Daniel Daspres (Percom-Soft Handels Ges.m.b.H, Schlagturn 24, 6135 Stans). He can be contacted via dsb@percom.at.

The lawfulness of the data processing is in accordance with the Austrian Data Protection Act, as well as the Regulation (EU) 2016/679 (GDPR). The legal basis is specified in each case for the following processing operations.

Notwithstanding the deletion details for individual data processing as stated below, such data shall not be deleted if it is required for other legitimate processing (e.g. self-promotion) in accordance with this Privacy Policy.



REGISTRATION

GUEST DATA:

By registering, the User gives his/her consent, in accordance with Art. 6 (1) (a) GDPR, that the personal data entered, first name, surname, address, birthday, language, will be stored by the Operator and used for the provision of additional content.

This personal data will be stored for the duration of the registration or, moreover, in accordance with statutory retention periods. The purpose of continued storage after completion of the registration process is to identify the person responsible in the event of any legal infringements. It is therefore in the overriding interest of the Operator, pursuant to Art 6 para 1 lit f of the GDPR.

The following data may be voluntarily provided by a guest during the course of registration: telephone number, reason for travel, photo, personal interests.

WHEN THE SILBERCARD IS ACTIVATED AT THE GUEST'S ACCOMMODATION PROVIDER OR OTHER REGISTRATION OFFICES:

Moreover, when the SILBERCARD is activated, the following data will also be collected: Accommodation, duration of stay (date from/to). All registration data will be transmitted to the following recipients: silver region Karwendel Tourist Board, the respective accommodation of the guest and partner companies when redeeming an associated benefit.

AUTOMATIC ACTIVATION VIA INTERFACE TO THE REGISTRATION SYSTEM:

In order to enable automatic activation of the Silbercard, an interface to the Feratel electronic registration system of has been established. Registration and use of the Silbercard is only possible if you agree to the following data reconciliation: after acquiring consent, the interface compares the guest's registration data from the Silbercard App with the data from the legally required electronic registration to confirm the guest's period of stay. The period of stay determines which variant of the Silbercard the guest can use. The adjustment takes place in pre-determined cycles, therefore requires no data storage.

Your consent to the data comparison is voluntary. If you do not wish to give your consent to the data comparison, you can apply for a printed Silbercard. Details can be found under <https://silberregion-karwendel.com/en/silbercard>

WHEN REDEEMING BENEFITS AT PARTICIPATING PARTNER COMPANIES:

When a guest redeems benefits at a participating partner business, the following data is recorded: benefit, time of redemption. This data is transmitted to silver region Karwendel Tourist Board as well as to the respective accommodation provider of the guest.

An anonymous survey is carried out for the following data categories: time spent in the SILBERCARD App, pages viewed within the SILBERCARD app, location, navigation behaviour within the App. This anonymised data is available to silver region Karwendel Tourist Board.

Only silver region Karwendel Tourist Board can access the e-mail addresses of processors and admins in backend.

PARTNER COMPANY DATA

The following partner company data is delivered via an interface and displayed to the silver region Karwendel Tourist Board: name, ID, status, telephone number, e-mail address, website, address, coordination, teaser text, description text, image. Silver region Karwendel Tourist Board may optionally record the following data in the backend system: e-mail address for user account, telephone number, e-mail address, salutation, first name, last name, IBAN, VAT number, billing address. In addition to silver region Karwendel Tourist Board, the respective partner company has access to the specified data, provided they have set up a user account.

ACCOMMODATION DATA

The following accommodation data is delivered via an interface and displayed to the silver region Karwendel Tourist Board: name, ID, status, telephone number, e-mail address, website, address, coordination, image. Only silver region Karwendel Tourist Board can access this data.

INTEREST-SPECIFIC PUSH MESSAGES OR DIRECT MAILINGS

The user has the option to specify personal interests in the SILBERCARD app after logging in. If the user exercises this option, push messages or direct mailings will be sent to him/her, based on the information provided. In this respect, processing is for direct marketing purposes. Specifying personal interests is voluntary and not necessary to take advantage of SILBERCARD services.

The Operator processes the information in order to create the most suitable offers. This processing does not intend to have a legal effect or any similar detrimental result. The Operator carries out this processing on the basis of its overriding legitimate interest.

The User can contact the operator and object to this form of processing if

- ➔ profiling is carried out for the purposes of direct marketing (Art 21 para. 2 GDPR) or
- ➔ profiling is based on the legal basis of the overriding legitimate interest (Art. 21 (1) GDPR).

APP RIGHTS

THE FOLLOWING PERMISSIONS ARE REQUIRED BY IOS AND ANDROID:

- ➔ **Identity:** Usage: An account for the App is created on the device
- ➔ **Contacts:** Usage: Accommodation contact can be saved in the user's address book.
- ➔ **Telephone:** Usage: The app can be used to call the hotel, room service, reception or various companies in the region.
- ➔ **Photos/media/files/storage:** Usage: Contents of the app (texts, pictures) are stored on the device in order to be available offline.
- ➔ (Optional) internet access
- ➔ (Optional) camera Usage: For optional profile picture
- ➔ (Optional) push notifications
- ➔ (Optional) GPS position (distance indicator to respective partner business)

MISCELLANEOUS

This Privacy Policy was updated on 14.03.2019. The Operator reserves the right to make changes to this declaration. The latest valid version can be found on the Operator's website.

DISCLAIMER

All content has been carefully checked. Nevertheless, no guarantee can be given for the correctness, completeness and actuality of the information, nor for the constant availability of the offer. Insofar as third party services are included in the offer, the responsibility for such services lies exclusively with the third party.

CHARGES

You are responsible for use of the App and should be aware that third parties may charge you for use of the App (e.g. internet or call charges). Roaming charges may also apply if you use the App abroad. To avoid additional costs, you should first make sure that data roaming is switched off in your phone settings (Settings > General > Network) before travelling abroad. If data roaming is deactivated, you can be sure that the device will not automatically connect to the Internet via the mobile network. All charges are to be borne by the user.

LINKS

The publisher is not the author of the pages to which reference is made and accepts no liability for them. Should any of the referenced pages contain content of concern, it should be reported. In such cases, the link will be deleted immediately.

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