

# INFORMATION ON THE PROTECTION OF PERSONAL DATA

**Last updated: 10<sup>th</sup> October 2024**

Protecting our customers' personal data is one of our core concerns.

This document applies to data that we collect online, on our websites and mobile applications, but also to data that we collect offline in resorts or on the ski area or during events.

It is our wish to provide you with all necessary information for a good understanding of how your data are used:

1. Who is responsible for the use of your data?
2. With whom are your data shared?
3. When are your personal data collected?
4. What data do we collect?
5. How do we use your data and for how long do we keep them?
6. Are there any specific measures for children?
7. Where are your personal data stored?
8. How are your data secured?
9. What are your rights relative to your data?
10. Any questions? Contact us!

## **1. Who is responsible for the use of your data?**

When you book and/or access our services, your personal data are both processed by:

- [Compagnie des Alpes](#), parent company of the Compagnie des Alpes Group, with capital of €25,266,567.50, registered with the Paris TCR 349 577 908, having its registered office at 50-51 boulevard Haussmann 75009 Paris,

And

- [La SAS SEVABEL](#) **affiliated company of the Compagnie des Alpes Group and operating the ski area of Les Menuires Saint-Martin de Belleville**, with capital of 3 235 500,00 €, registered with the TCR of Chambéry 353 065 964, having its registered office at 1349 Avenue de la Croisette, Les Menuires, 73 440 Les Belleville.

In this policy the word "we", refers to these two companies, which may act together as joint controllers for the processing operations indicated below.

While Compagnie des Alpes is in charge of the management and supervision of the IT system used to collect and process your data, it is nevertheless solely up to **Sevabel, as an autonomous data controller, to manage the** contractual relationship with you, to provide

you with the ordered services, and to carry out marketing and advertising operations on its services and brands or ancillary services on the ski area (WiFi, photos, ski instructions).

## 2. With whom are your data shared?

### Compagnie des Alpes Group internal recipients :

Your data are processed jointly by Sevabel and Compagnie des Alpes, the parent company of the Compagnie des Alpes Group.

Within these two companies, your data are only accessible to a limited number of people, within specific departments (customer service, sales, accounting, IT, etc.), only if access to the data is necessary for the needs of their functions.

However, your data are not shared with other member companies of the Compagnie des Alpes group, unless you have expressly authorised us to do so.

### Compagnie des Alpes Group external recipients :

Your data may also be shared with recipients outside of the Compagnie des Alpes Group:

- With all of our technical **service providers whose intervention is necessary** in order to carry out the processing operations indicated below (IT service providers, payment service providers, etc.), for the purposes of processing your order and improving our services and exclusively within the limits of our instructions;

You may be offered the option, when making purchases of our website or app, to use alternative payment methods such as Apple Pay or Google Pay. The use of these payment methods is optional and entirely up to you. For your information, your credit card number is never transmitted. In order to process the payment, the following information is transmitted to us :

- From Apple : your postal code, your email address, your Apple account number, and, if necessary, your delivery address.
- From Google : your postal code, your virtual account number, payment method information, and your personal information.

Additionally, in the context of payment, we may share the following information :

- To Apple : the existence of the transaction, but not the nature of the items you have purchased, nor their amounts.
- To Google : the existence of the transaction, its date, time, and amount, the merchant's location and description, a description of the goods and services purchased, your name, email, and the payment method used.

For more information, you can refer to [Apple's privacy policy](#) and [Google's terms of use](#) as well as [the additional terms of use for Google Pay](#).

- With **social networks**, only if you choose to create your customer account via the quick "social login" procedure.  
If you choose this option, you will be able to use your Facebook, Apple or Google account to register on our site, without having to re-enter your details. By using this feature, you agree to share with us certain information about you from your social network.

The data sent to us by the social network include your surname, first name and e-mail address. These data are necessary for the creation of your customer account. We do not share information with social networks about your activities and orders on the site <https://www.skipass-lesmenuires.com/en/> and our mobile application, however these networks will have information relating to connections to your account. Before using the "Social Login", we invite you to read the privacy protection policies of the social networks to find out how they use your data.

- [Facebook](#)
- [Apple](#)
- [Google](#)

You may also receive communications relating to the activities of the ski resort where you purchased your ski lift packages. These communications are sent to you through our partnership with the tourist offices, with whom we write newsletters on the destination, as the ski lifts are a major component in the life of the ski resort. However, your data are not shared or reused by these partners in this context.

- Where appropriate, **with national or local authorities**, if required by law or as part of an investigation and in accordance with regulations.

### **3. When are your personal data collected?**

We may collect your personal data on different occasions:

#### **Online:**

On our website or mobile application, to order lift passes, receive our newsletters, log in to your account or take advantage of our digital services.

#### **Within our ski resorts and ski areas:**

When you use our facilities, alone or with friends and family: at the checkout, at our automatic terminals, photography spots, disabled access, access to reduced rates, use of our public WiFi, ski lockers, video surveillance.

#### **During our interactions with you:**

When you open or reply to a newsletter, take part in a satisfaction survey or participate in a contest. When you call customer services with a complaint.

#### **Via our Partners:**

When you access our services through an intermediary (e.g. travel agencies, partner distributors, tourist office).

### **4. What data do we collect?**

We only collect the data that are strictly necessary for their use, and no more!

Depending on how you use the ski area, the ski resort or our websites, we may collect the following information:

- Information required to create your customer account (surname, first name, e-mail address, date of birth, postal address)
- Payment information
- Telephone number
- Photographs (for the purposes of ski lift passes or via devices or terminals made available in the ski area)
- Video recording (for security purposes, and the protection of people and property)
- Visit data (use of the ski pass)
- Browsing data on our website and mobile application (on this subject, see our information on [cookies!](#))
- Geolocation and geofence ((for services on our mobile application '3 Vallée Explorer' only)
- If necessary and depending on the subscribed product, the names and e-mail addresses of your relatives for groups and families
- Supporting documents for access to discounted rates or priority access, the conditions of which are set out in detail on our website. You will be asked to present original supporting documents at our ticket offices within the ski resort. A copy of this proof may be made solely for the purposes of combating fraud.
- Proof of identity in case of doubt about your identity and before being able to respond to your request.

## 5. How do we use your data and for how long do we keep them?

At the end of the retention periods defined below, we delete your data from our systems or make it anonymous so that it can no longer be used to identify you.

Processing operations	Legal basis	Data retention periods
Customer account	Fulfilment of the contract	For as long as your customer account is active, and for up to 2 years after the last connection to your account.
Order processing	Fulfilment of the contract	For online purchases: for five years from the date of purchase if the value of the order is less than €120, for ten years if the value of the order is €120 or more (and for 5 years for transactions at the checkout). The data linked to your bank card are retained for 13 months by our payment service providers after the last debit date for proof purposes in the event that the transaction is disputed (15 months in the case of deferred debit payment cards). The cryptogram is not retained after the transaction.

Controlling user access to the ski lifts	Fulfilment of the contract	The times and locations of user's passage at the ski lifts are kept for forty-eight hours following collection. Other data related to the package are kept for the period of validity of the ticket.
Fraudulent access to ski lifts	Legitimate interest	In the event of payment of the lump-sum compensation for fraud: until full payment of this compensation. In the event of non-payment of the lump-sum compensation: for twelve months following the issue of the offence report or until the date on which the user's conviction becomes final, whichever is later.
Providing users with assistance in case of an accident, following up on the administrative aspects of the accident, invoicing the cost of the assistance and dealing with any disputes	Safeguarding a person's vital interests	For as long as it takes to care for the user and the recovery of the related costs.
Satisfaction surveys	Legitimate interest	Time required to achieve the survey objective, then anonymized.
Contests	Running of the contest	6 months from the end of the contest.
Sending newsletters / prospecting campaigns by e-mail or sms.	Consent, or legitimate interest if you are a customer who has purchased a product on our website, our automated terminals or our mobile application	3 years from your last contact with us (e.g. a request for commercial documentation, a click on a hypertext link contained in our newsletter).
Complaint handling and after-sales service	Fulfilment of the contract	5 years after the claim has been closed
Preparation of statistics	Legitimate interest	Time required to achieve the objective of the statistics, then anonymized.
Copy of supporting documents for reduced and special rates	Legitimate interest (fight against fraud)	For the time necessary to process the order
Customization of navigation/profiling	Consent	13 months
Use of the public WiFi that we make available to you	Legal obligation	1 year (retention of technical connection data)

Photographs taken for printing out the packages	Fulfilment of the contract	For the duration of the validity of the package, unless you agree to a 3-year retention period for the purpose of re-use for future orders.
Photographs taken on the ski lifts	Fulfilment of the contract	Ski day only, and if the photograph is purchased: 12 months from the date of purchase.
Photographs taken on the ski lifts	Legitimate interest (compliance with the instructions for using the ski lifts and facilitation of any evacuation operations)	For 72 hours following their collection, or 4 hours following the collection if the photographs have been used to facilitate the raising of the safety bar on chairlifts and to facilitate any evacuation in case of an interruption in the operation of the ski lifts.  7 days following their collection to conduct system reliability analyses (Bluecime)
Photographs taken at our photo terminals (photoboosts)	Consent	Ski day only
Services on the mobile application, e.g. geolocation, geofence, time, distance and speed tracking (skier performance measurements)	Fulfilment of the contract	For the duration of use of the mobile application (data are only stored on the user's terminal).
Management of skiing instructions	Fulfilment of the contract	Ski day
Management of lost and found objects	Fulfilment of the contract	1 year from the declaration of loss of the object
Video surveillance	Legitimate interest	15 days following the recording of the images
Safety of ski lifts	Legitimate interest	Photos are automatically deleted after 40,000 vehicles or one week of operation (Bluecime)
Exercising your GDPR rights	Legal obligations	10 years from the closing of the request. When proof of identity has been required, it will be deleted as soon as verification has been completed.
Litigation management	Legitimate interest	Until all avenues of appeal have been exhausted
Application	Legitimate interest	2 years after data collection for unsuccessful applications

## 6. Are there any specific measures for children?

Although the family dimension of our activities is at the heart of our concerns, we do not process any data specifically relating to children.

When our services are being used by persons under the age of 15, we recommend that they be accompanied by an adult. The consent of parents or legal guardians may be obtained when their personal data are collected, if necessary.

## **7. Where are your data stored?**

All of your personal data are stored exclusively on servers located within the territory of the European Union.

Although hosted within the territory of the European Union, these data may be accessible from third countries when we use technical service providers (e.g.: AWS, Microsoft, Google), which are based abroad (i.e.: United States, Israel). Any access from these countries is considered to be a data transfer, but is necessary for the proper operation and maintenance of the IT tools that they offer. These service providers have real expertise that justifies their involvement.

We make every effort with these service providers to ensure that your data are protected in accordance with European regulations. These service providers only act within the framework of our instructions. Contracts are systematically signed with the latter, and transfers of personal data are governed by enhanced contractual clauses specifically designed for this purpose (standard contractual clauses - SCCs - published by the European Commission) where the laws of the country in question do not offer protection equivalent to the GDPR (so-called "adequate" countries). If necessary, additional technical or legal measures are put in place.

## **8. How are your data secured?**

The security of your personal data is a central concern for the companies in the Compagnie des Alpes group, which pool their resources to ensure that you benefit from an appropriate level of security that is up to date with the state of the art.

In order to preserve the confidentiality and security of your personal data, and notably to protect them against unlawful or accidental destruction, accidental loss or alteration, or unauthorised disclosure or access, the Compagnie des Alpes Group takes appropriate technical and organisational measures, and imposes the same level of requirements on its subcontractors. These measures are adapted according to the sensitivity of the data processed and the risk level.

The Compagnie Group has put in place procedures to detect, analyse and monitor security incidents and any suspected breach of your personal data, and to be able to block access to the data at any time. Procedures for managing personal authorisations have also been put in place to ensure that access to data is as restricted as possible.

Despite our efforts, vulnerabilities may still be present in our systems. If you think that you have detected a vulnerability, please contact us using this [form](#) (*vulnerability disclosure page*), while respecting the principles described there.

## 9. What are your rights over your data?

You have a number of rights in relation to your personal data held by us:

- **The right to object:** You no longer wishes to receive our commercial communications, object to a decision related to your profiling, or withdraw consent
- **The right to rectify your data:** change of home or e-mail address? let us know by keeping your details up to date!
- **The right to access your data:** you may request a copy of all your personal data held by us, in an understandable format.
- **The right to erase your data:** You wish to delete your entire customer account and erase all of your personal data in our possession. We will comply with your request, with the exception of accounting and tax records relating to your transactions, as well as those required for the creation of our evidence files (in the event of any legal proceedings), which must be retained.
- **The right to freeze the use of your data:** if you are faced with a litigious situation and wish to prevent the deletion of your data, your data will be retained without being used.
- **The right to take your data:** You wish to recover some of your data. You are then free to store them elsewhere or to transfer them easily from one system to another, so that they can be reused for other purposes.

You will find all of our contact details below for the exercise of these rights.

## 10. Any questions? Contact us!

Do you have a question? Would you like to stop receiving our newsletters? Delete your account?

We have appointed a Data Protection Officer to answer all of your questions and ensure the protection of your personal data.

To contact this person, click [here](#) !

Please fill in the form provided for this purpose, and your request will be processed within one month. For mobile apps, don't forget that you can change your authorisations at any time from your telephone's settings, for each of your apps.

You can also reach our DPO:

- By post to the following address: 1349 Avenue de la Croisette, Les Menuires, 73 440 Les Belleville

or

- By e-mail to the following address: [sevabel.privacy@compagniedesalpes.fr](mailto:sevabel.privacy@compagniedesalpes.fr)

If there are serious doubts about your identity, and if it cannot be done otherwise, you may be asked to provide proof of identity for the processing of your request, simply to ensure that we are dealing with the right person.

If, despite our efforts, you feel that our response is incomplete, you can contact the CNIL <https://www.cnil.fr/fr>