

PRIVACY POLICY ON THE PROCESSING OF IMAGES USING THE SMART GUARD SYSTEM – SKIPASS USE MONITORING

In accordance with Article 13 of Regulation (EU) 679/2016 (GDPR), we inform you that, at the ski lifts in the mountain resorts of Friuli Venezia Giulia managed by PromoTurismoFVG, a technological system named Smart Guard is in use, designed to prevent and combat the misuse of skipasses.

Purpose of the image processing

The Smart Guard system is designed to verify that the same skipass is being used consistently by the same user over time, in order to prevent any use that does not comply with the terms and conditions of sale for skipasses (e.g., transfer to unauthorised third parties). Eligibility for the available special discounts (e.g., Baby, Junior, Senior and Over-75) is subject to a separate verification process that is carried out upon presentation of a valid ID document, in accordance with the terms and conditions of sale.

How the system works

The first time the skipass is used, the system captures a photograph of the user ('reference photo'), which is linked to the relevant skipass. Certain visible elements of the reference photo are analysed, including, among other things:

- body build;
- clothing features (e.g., colours, shapes).

Each time the same skipass is used, the system captures a new photograph and compares it with the reference photo using an algorithm based on machine learning techniques. When the algorithm detects significant differences between the images, a potential anomaly alert is generated, as described in the following section.

The system does not carry out any biometric facial recognition and does not analyse or process unique facial characteristics for the purpose of unambiguously identifying an individual. Considering the nature of the data being analysed, the processing is subject to a specific data protection impact assessment (DPIA) carried out by the Data Controller, with the support of the Data Protection Officer (DPO).

Automated processing and operator intervention

Each photograph taken upon any subsequent use of the skipass is compared, by means of the algorithm described above, solely and exclusively with the reference photograph associated with that specific skipass, for the sole purpose of verifying that subsequent uses are attributable to the same skipass holder.

Should the algorithm detect significant differences compared with the reference photograph, a potential anomaly alert is generated and sent exclusively to authorised personnel (facility personnel and/or inspectors), who may carry out the relevant checks even at a later time following the individual's access to the facilities. This alert is intended solely as an operational support tool and does not automatically result in the skipass being blocked or suspended.

Any decision regarding the validity of a skipass is taken exclusively by an authorised officer, who assesses the alert on a case-by-case basis, ensuring that a genuine human assessment takes place before any consequences arise for the person concerned. Should the irregularity be confirmed, the consequences set out in the terms and conditions of sale for skipasses will apply (including, as appropriate, the invalidation or withdrawal of the skipass and any obligation to pay the correct price). The terms and conditions are available at the following link: www.turismofvg.it/en/mountain365/skipass/documents.

Legal basis for processing

The processing of personal data is necessary for the performance of the contract to which the data subject is a party, in accordance with Article 6(1)(b) of Regulation (EU) 679/2016 (GDPR). The purchase and use of the skipass are in fact subject to the terms and conditions of sale, including the fact that the pass is personal and non-transferable; this system is designed to verify compliance with these terms.

Image storage

The reference photograph and the photographs taken on subsequent uses of the skipass are stored and retained for a period corresponding to the validity period of the relevant skipass and, in any event, not beyond that period.

Specifically:

- For daily skipasses, the images are deleted at the end of the day for which the skipass is valid;
- For multi-day skipasses, the images are deleted at the end of the validity period of the skipasses;
- For season skipasses, the images are retained until the end of the relevant ski season.

Should the system detect a potential anomaly and this be confirmed by authorised personnel, the images relating to the anomaly may be stored and retained for the time strictly necessary to carry out the investigation and manage any activities provided for in the skipass sales contract and, in any event, for the period necessary to resolve any disputes.

Location where data is stored and processed: European Union.

Recipients of the data

The images are processed, on behalf of the Data Controller, by the provider of the Smart Guard system (Team Axess) and by any technical service providers engaged by the latter to provide the service, who have been appointed as Data Processors in accordance with Article 28 of Regulation (EU) 679/2016 (GDPR).

Data Controller and Data Protection Officer (DPO)

The Data Controller is PromoTurismoFVG, with its registered office at Via Locchi 19, 34123 Trieste, Italy, VAT ID number and tax code 01218220323.

Contact details of the Data Controller: skipass@promoturismo.fvg.it.

The Data Controller has appointed a Data Protection Officer (DPO), whose contact details can be found on the website www.promoturismo.fvg.it.

Rights of the data subject

The data subject may exercise the rights provided for in Articles 15 et seq. of Regulation (EU) 679/2016 (GDPR), including the right of access, rectification, erasure and restriction of processing, within the limits provided for by the applicable legislation.

The data subject also retains the right to lodge a complaint with the Autorità Garante per la protezione dei dati personali (Italian Data Protection Authority), Piazza Venezia 11, 00187 Rome, in accordance with the procedures set out on the www.garanteprivacy.it website.

To exercise your rights or for further information on the processing of personal data, you may contact the Data Controller or the DPO using the contact details provided above.

This privacy policy is available on the www.turismofvg.it/en/mountain365.