

# Data Privacy Policy of the Ski Club Arlberg

## I. GENERAL INFORMATION

Dear Ski Club Arlberg Members:  
Dear Readers!

The purpose of this letter is to inform you about essential aspects of the Ski Club Arlberg Data Privacy Policy which relates to your membership in the Ski Club Arlberg. In the light of the General Data Protection Regulation (GDPR), this letter is intended to inform you about our handling of your personal data and about your rights under the GDPR.

This present data protection information can also be called up on the Ski Club Arlberg homepage and is consistently updated there.

## II. Responsible Party

The collection and processing of personal data is handled under the responsibility of:

Ski Club Arlberg  
Dorfstraße 46  
6580 St. Anton am Arlberg  
[office@skiclubarlberg.at](mailto:office@skiclubarlberg.at)  
+43 5446 2796

## III. Purpose and Legal Basis for Data Processing

### 1 Membership in the club

With your admission to membership, the Ski Club Arlberg collects the following personal data: Name, address, date of birth, nationality, telephone number, fax number, email address, T-shirt size, signature. If a direct debit card is used, then the banking information is also collected. This data will be processed by the Ski Club Arlberg within the scope of membership administration (maintaining relevant lists, sending of club information, accounting for membership contributions etc.) and in performance of the statutory purpose of the club (sending of invitations, newsletters, organization of courses, club publicity efforts etc.)

The provision of this essential personal data is required for membership in the Ski Club Arlberg. If this data is not provided, then your membership in the Ski Club Arlberg will not be allowed. This data will also be transmitted to the ÖSV, TSV and to the ASVÖ (see below).

The provision of other personal data (credit card data, other contact data, profession, marital status etc.) is voluntary. To the extent that your other personal data is volunteered or collected, this data will also be processed by the Ski Club Arlberg as necessary and expedient.

The processing of your personal data generally takes place as required in performance of a contract, in particular in handling of your membership relationship in the Ski Club Arlberg (Art. 6 para. 1 (b) GDPR). Any additional data processing shall occur based on your consent (Art. 6 para. 1 (a) GDPR) or in compliance with the reasonable interests of the club (Art. 6 para. 1 (f) GDPR).

- The reasonable interests of the club consist, for example, in providing information to the public regarding the activities of the club;
- in the provision of services by the Ski Club Arlberg or affiliated companies to which only club members are entitled;
- in the provision of special club services (e.g. club vehicle) ...

### 2 Newsletter

As a member of the Ski Club Arlberg you will receive a newsletter at regular intervals, based on § 3 line 1 (a) of the minutes and based on your express or tacit consent (§ 107 TKG). Your name and email address will be processed exclusively by the Ski Club Arlberg for sending of the newsletter. This data processing occurs primarily based on Art. 6 para. 1 (a) GDPR (consent) or based on our reasonable interest in direct advertising (Art. 6 para. 1 (f) GDPR). You can opt-out of the newsletter at any time by sending an email to [office@skiclubarlberg.at](mailto:office@skiclubarlberg.at). In such case you will no longer received any subsequent advertising newsletter.

### 3 Sports Pros

Additional personal data is processed by our sports pros. This pertains to sports-related training and performance data (partly also data related to sports medicine), results, flash photographs, profiles, etc. This data processing is used, *inter alia*, to allow active training in competitive sports, the implementation of events, documentation and communication of services. This occurs based on the consent of the athlete or of the legal guardian (Art. 6 para. 1 (a), Art. 9 para 2 (a) GDPR), based on the necessity in fulfillment of a contractual or legal obligation (Art. 6 para. 1 (b) or (c) GDPR) or based on the predominant, lawful interests of the Ski Club Arlberg in the promotion and public communication of services of sports pros (Art. 6 para. 1 (f) GDPR).

## 4 Events

The Ski Club Arlberg is also the sponsor of various events (e.g. ski races or club evenings). If you register for one such event, we will process the personal data you provided, and also any additional data collected during the event. The data processing shall occur for processing of your registration, for administration of the event and for documentation and public communication of the event, including the associated results. This data processing occurs based on your consent (Art. 6 para. 1 (a) GDPR), the necessity for contract performance (Art. 6 para. 1 (b) GDPR) or based on our reasonable interests in the implementation of and public communication about the event (Art. 6 para. 1 (f) GDPR).

Sometimes photos and videos will be prepared at our events, in which participants, assistants and spectators may be depicted. These photographs are processed firstly for internal documentation, and secondly for public communication about the event. Under some circumstances, the photographs may also be made available to the public (even outside of the EU) in print and online media, TV-formats and social media. This data processing occurs based on our reasonable interests in the implementation of and public communication about the event (Art. 6 para. 1 (f) GDPR, § 12 para. 2 line 4 DSG) or based on your consent (Art. 6 para. 1 (a) GDPR). You are not required to allow yourself to be photographed. Please inform the photographer about your preference not to be photographed or filmed, preferably before preparation of the photograph. You can object to the processing of the photographs on which you are discernible and appear in an identifiable manner at any time, in reference to Art. 21 para. 1 GDPR (objection with grounds). The Ski Club Arlberg will then act to delete/anonymize the particular photographs, where possible.

### IV. Receivers of your Data

Even though the Ski Club Arlberg does not basically transfer personal data to third parties, this is sometimes necessary - often because of legal requirements and due to association or club bylaws. In addition, sometimes outside vendors (including within the EU) are called in with whom we have a contracting relationship pursuant to Art. 28 GDPR.

Transmission of the data occurs by the Ski Club Arlberg only to the extent necessary or expedient to attain the club's objectives, or in the case of a legal or other lawful obligation. In any case, strict adherence to the law will govern any such transmittal. The transmittal of data shall take place to the following receivers and/or categories of receiver:

- Österreichischer Skiverband, Olympiastraße 10, A-6020 Innsbruck, [info@oesv.at](mailto:info@oesv.at);
- Tiroler Skiverband, Marktgraben 16, A-6020 Innsbruck, [office@tirolerskiverband.at](mailto:office@tirolerskiverband.at);
- Vorarlberger Skiverband, Markus-Sittikus-Str. 5, 6845 Hohenems, [office@vski.at](mailto:office@vski.at);
- Allgemeiner Sportverband Österreichs (ASVÖ), Dommayergasse 8, A-1130 Vienna, [office@asvoe.at](mailto:office@asvoe.at);
- Companies, associations and societies in which the Arlberg Ski Club is involved;
- Trainers/managers;
- Club members;
- EDP managers, operators of EDP infrastructure (especially membership administration);
- Tax advisors, attorneys, notaries;
- Courts, administrative authorities;
- Insurance agencies;
- Banks and payment service providers;
- Print and online media;
- TV presenters;
- Social media platforms (sometimes outside the EU)

### V. Retention Time

Your personal data is saved basically for the duration of your membership, and may be retained for a longer period of time based on legal requirements for retention and documentation. Provided additional data processing is no (longer) required within the scope of your membership (and there is otherwise no legal basis for the data processing), then your personal data may be deleted at an earlier time.

### VI. Your Data Privacy Rights

The GDPR grants you extensive rights as the "data subject:" You have a right to obtain information about your relevant personal data, to correction or deletion of personal data, and a right to restrict the processing of your personal data. You can rescind your granted consent for data processing by the Arlberg Ski Club at any time, and you can also object to the partial processing of your personal data. A cancellation of consent and/or an objection to the data processing does not otherwise vacate the remaining legal principles for the data processing. In addition, you have a right to data portability.

If you have reason to believe that the data processing by the Ski Club Arlberg is in violation of these data protection regulations, then we request that you contact us. But you are also entitled to file a complaint with the Austrian Data Protection Authority (Wickenburggasse 8, 1080 Vienna, Telephone: +43 1 521 52-25 69, E-Mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)).

St. Anton am Arlberg, dated 10 October 2018