

Privacy Policy

With this **privacy policy**, we inform about the processing of **personal data** in connection with our **activities and operations**, including our **websites** under the domain names flimslaax.com, flf.ch and flfmanagement.ch. In particular, we provide information on the purposes, methods, and locations of our data processing. We also inform about the rights of individuals whose data we process.

For specific or additional activities and operations, we may publish additional privacy policies or other information regarding data protection.

We are subject to Swiss data protection law as well as any applicable foreign data protection law, particularly that of the European Union (EU) under the European General Data Protection Regulation (GDPR).

The European Commission recognized, by [decision of 26 July 2000](#), that Swiss data protection law ensures adequate data protection. By [report dated 15 January 2024](#), the European Commission confirmed this adequacy decision.

1. Contact Details

Responsibility for the processing of personal data:

Flims Laax Falera Management AG

Via Nova 62
7017 Flims

info@flimslaax.com

In certain cases, third parties may be responsible for processing personal data, or there may be shared responsibility with third parties.

1.1 Data Protection Officer or Advisor

We have the following data protection officer or advisor as a contact point for affected individuals and authorities in matters related to data protection:

Jascha Schmid

Flims Laax Falera Management AG
Via Nova 62
7017 Flims

info@flimslaax.com

1.2 Data Protection Representation in the European Economic Area (EEA)

We have the following data protection representative in accordance with [Art. 27 GDPR](#):

VGS Datenschutzpartner GmbH

Am Kaiserkai 69
20457 Hamburg
Germany

info@flimslaax.com

The data protection representative serves as an *additional* contact point for individuals and authorities in the European Union (EU) and other European Economic Area (EEA) countries regarding inquiries related to GDPR.

2. Terms and Legal Bases

2.1 Terms

Affected Person: Any natural person whose personal data we process.

Personal Data: All information relating to a specific or identifiable natural person.

Special Categories of Personal Data: This includes data on trade union, political, religious, or ideological views and activities; data on health, intimate sphere, or ethnicity; genetic data; biometric data that uniquely identify a natural person; data on criminal and administrative sanctions or prosecutions; and data on social assistance measures.

Processing: Any handling of personal data, *regardless* of the methods and procedures used, such as querying, matching, adjusting, archiving, retaining, reading, disclosing, acquiring, recording, collecting, deleting, revealing, arranging, organizing, storing, modifying, disseminating, linking, destroying, and using personal data.

European Economic Area (EEA): [Member states of the European Union](#) (EU), plus Liechtenstein, Iceland, and Norway.

2.2 Legal Bases

We process personal data in accordance with Swiss data protection law, particularly the [Federal Act on Data Protection](#) (Data Protection Act, FADP) and the [Data Protection Ordinance](#) (DPO).

We process – insofar as the European General Data Protection Regulation (GDPR) applies – personal data or personal data in accordance with *at least* one of the following legal bases:

- [Art. 6 Para. 1\(b\) GDPR](#) for the necessary processing of personal data to fulfill a contract with the affected person and to carry out pre-contractual measures.
- [Art. 6 Para. 1\(f\) GDPR](#) for the necessary processing of personal data to protect legitimate interests – including the legitimate interests of third parties – provided that fundamental freedoms, rights, and interests of the affected person do not override. These interests include ensuring the continued, user-friendly, secure, and reliable operation of our activities and services, guaranteeing information security, protection against misuse, enforcement of legal claims, and compliance with Swiss law.
- [Art. 6 Para. 1\(c\) GDPR](#) for the necessary processing of personal data to fulfill a legal obligation to which we are subject under applicable law in a member state of the European Economic Area (EEA).
- [Art. 6 Para. 1\(e\) GDPR](#) for the necessary processing of personal data to perform a task in the public interest.
- [Art. 6 Para. 1\(a\) GDPR](#) for the processing of personal data with the consent of the affected person.
- [Art. 6 Para. 1\(d\) GDPR](#) for the necessary processing of personal data to protect the vital interests of the affected person or another natural person.

- [Art. 9 Para. 2 ff. GDPR](#) for the processing of special categories of personal data, particularly with the consent of the affected persons.

The European General Data Protection Regulation (GDPR) refers to the processing of personal data as processing personal data and the processing of special categories of personal data as processing of special categories of personal data ([Art. 9 GDPR](#)).

3. Type, Scope, and Purpose of Processing of Personal Data

We process the personal data that is *necessary* to ensure that we can carry out our activities and services in a continuous, user-friendly, secure, and reliable manner. The processed personal data may, in particular, include categories such as browser and device data, content data, communication data, metadata, usage data, master data including inventory and contact data, location data, transaction data, contract data, and payment data.

We also process personal data that we receive from third parties, obtain from publicly accessible sources, or collect during the performance of our activities and services, to the extent that such processing is permissible by law.

We process personal data as required, with the consent of the affected persons. In many cases, we can process personal data without consent, such as to fulfill legal obligations or to protect overriding interests. We may also request the consent of affected persons if their consent is not legally required.

We process personal data for the *duration* necessary for the respective purpose. We anonymize or delete personal data, especially depending on legal retention and limitation periods.

4. Disclosure of Personal Data

We may *disclose personal data* to third parties, have it processed by third parties, or process it jointly with third parties. Such third parties may include specialized service providers whose services we use.

We may, for example, disclose personal data to banks and other financial service providers, authorities, educational and research institutions, consultants and attorneys, interest groups, IT service providers, cooperation partners, credit and credit rating agencies, logistics and shipping companies, marketing and advertising agencies, media, organizations and associations, social services, telecommunications companies, and insurance companies.

5. Communication

We process personal data to be able to communicate with third parties. In this context, we process data that an affected person transmits to us when contacting us, such as by postal mail or email. We may store such data in an address book or similar tools.

Third parties who transmit data about other persons are required to ensure data protection for such affected persons. This includes ensuring the accuracy of the transmitted personal data.

We use selected services from suitable providers to enhance our communication with third parties.

6. Applications

We process personal data about applicants to the extent necessary to assess their suitability for employment or for the later execution of an employment contract. The necessary personal data is specified in the requested information, for example, as part of a job advertisement. We may

publish job advertisements with the help of suitable third parties, for instance, in electronic or printed media or on job portals and employment platforms.

We also process personal data that applicants *voluntarily* disclose or publish, especially as part of cover letters, resumes, and other application documents as well as online profiles.

We process – insofar as the General Data Protection Regulation (GDPR) applies – personal data about applicants specifically in accordance with [Art. 9 Para. 2\(b\) GDPR](#).

7. Data Security

We implement appropriate technical and organizational measures to ensure data security that matches the risk level. Through our measures, we ensure the confidentiality, availability, traceability, and integrity of the personal data processed, though absolute data security cannot be guaranteed.

Access to our website and other online presences is secured through transport encryption ([SSL/TLS](#), especially [Hypertext Transfer Protocol Secure, abbreviated HTTPS](#)). Most browsers warn against visiting websites without transport encryption.

Our digital communication – like *essentially* any digital communication – is subject to mass surveillance without cause or suspicion by security authorities in Switzerland, other parts of Europe, the United States, and other countries. We have no direct influence over the corresponding processing of personal data by intelligence agencies, police forces, or other security authorities. We also cannot exclude the possibility of targeted surveillance of affected persons.

8. Personal Data Abroad

We generally process personal data in Switzerland and the European Economic Area (EEA). However, we may also transfer personal data to other countries or have it processed there.

We may transfer personal data to all [countries on Earth](#) and elsewhere in the universe if the local law guarantees adequate data protection according to a [decision by the Swiss Federal Council](#) and – insofar as the General Data Protection Regulation (GDPR) applies – also according to a [decision by the European Commission](#).

We may transfer personal data to countries whose laws do not provide adequate data protection if data protection is ensured through other means, particularly based on standard data protection clauses or other appropriate safeguards. In exceptional cases, we may transfer personal data to countries without adequate or appropriate data protection if the specific data protection requirements are met, such as the explicit consent of the affected persons or a direct connection with the conclusion or performance of a contract. We will gladly provide affected persons with information on applicable guarantees or provide a copy of any applicable safeguards upon request.

9. Rights of Affected Persons

9.1 Data Protection Claims

We grant affected persons all rights to which they are entitled under applicable data protection law. In particular, affected persons have the following rights:

- **Information:** Affected persons can request information on whether we process personal data about them and, if so, which personal data is processed. Affected persons also

receive the information necessary to assert their data protection claims and ensure transparency. This includes, among other things, the processed personal data, the purpose of processing, retention duration, any disclosure or transfer of data to other countries, and the origin of the personal data.

- **Correction and Restriction:** Affected persons can have incorrect personal data corrected, incomplete data completed, and processing of their data restricted.
- **Deletion and Objection:** Affected persons can have personal data deleted ("Right to be Forgotten") and object to the processing of their data with effect for the future.
- **Data Release and Data Transfer:** Affected persons can request the release of personal data or its transfer to another responsible party.

We may postpone, restrict, or deny the exercise of the rights of affected persons within the legally permissible framework. We may inform affected persons of any requirements that must be met to exercise their data protection claims. For example, we may refuse to provide information in whole or in part by referring to confidentiality obligations, overriding interests, or the protection of others. We may also refuse to delete personal data, particularly by referring to legal retention obligations.

We may, in *exceptional cases*, charge fees for the exercise of rights. We will inform affected persons of any fees in advance.

We are required to take appropriate measures to identify affected persons who request information or assert other rights. Affected persons are required to cooperate.

9.2 Legal Remedies

Affected persons have the right to enforce their data protection claims through legal channels or to file a complaint with a data protection supervisory authority.

The data protection supervisory authority for private controllers and federal bodies in Switzerland is the [Federal Data Protection and Information Commissioner \(FDPIC\)](#).

European data protection supervisory authorities are organized as [members of the European Data Protection Board](#) (EDPB). In some member states of the European Economic Area (EEA), data protection supervisory authorities are federally structured, [particularly in Germany](#).

10. Use of the Website

10.1 Cookies

We may use cookies. Cookies – including our own (first-party cookies) as well as those of third parties whose services we use (third-party cookies) – are data stored in the browser. Such stored data need not be limited to traditional cookies in text form.

Cookies may be stored temporarily in the browser as “session cookies” or for a specified period as so-called permanent cookies. "Session cookies" are automatically deleted when the browser is closed. Permanent cookies have a specified storage duration. Cookies allow, for instance, a browser to be recognized upon a subsequent visit to our website, thereby enabling measurement of our website's reach. Permanent cookies may also be used for online marketing purposes.

Cookies can be fully or partially disabled and deleted in the browser settings at any time. Without cookies, our website may not be available to its full extent. We ask for explicit consent for the use of cookies – at least where and to the extent required.

For cookies used for success and reach measurement or for advertising, a general opt-out is available for many services through the [AdChoices](#) (Digital Advertising Alliance of Canada), the [Network Advertising Initiative](#) (NAI), [YourAdChoices](#) (Digital Advertising Alliance), or [Your Online Choices](#) (European Interactive Digital Advertising Alliance, EDAA).

10.2 Logging

We may log at least the following information for each access to our website and other online presences if such information is transmitted to our digital infrastructure: Date and time including time zone, [IP address](#), access status (HTTP status code), operating system including user interface and version, browser including language and version, individual sub-page of our website accessed, data volume transferred, and the last website accessed in the same browser window (Referrer).

We log such information, which may also constitute personal data, in log files. The data is necessary to be able to provide our online presence in a continuous, user-friendly, and reliable manner. The data is also necessary to ensure data security – including through third parties or with the help of third parties.

10.3 Tracking Pixels

We may embed tracking pixels in our online presence. Tracking pixels, also known as web beacons, usually consist of small, invisible images or scripts written in JavaScript that are automatically retrieved when our online presence is accessed. With tracking pixels – including those from third parties whose services we use – at least the same information as in log files can be collected.

11. Notifications and Communications

11.1 Success and Reach Measurement

Notifications and communications may contain weblinks or tracking pixels that track whether a particular message was opened and which weblinks were clicked. Such weblinks and tracking pixels can also capture the usage of notifications and communications on a personal basis. We need this statistical tracking to measure success and reach in order to send notifications and communications effectively, user-friendly, securely, and reliably according to the recipients' needs and reading habits.

11.2 Consent and Objection

You must *generally* consent to the use of your email address and other contact details unless the use is permitted for other legal reasons. For double-confirmed consent, we may use a "double opt-in" procedure, where you receive a notification with instructions for double confirmation. We may log the collected consents, including [IP address](#) and [timestamp](#) for proof and security purposes.

You can *generally* object to receiving notifications and communications such as newsletters at any time. By objecting, you can also object to statistical tracking of usage for success and reach measurement. Required notifications and communications in connection with our activities and operations are exempt from this.

11.3 Service Providers for Notifications and Communications

We send notifications and communications with the help of specialized service providers.

12. Social Media

We are present on social media platforms and other online platforms to communicate with interested persons and inform them about our activities and operations. In connection with such platforms, personal data may also be processed outside of Switzerland and the European Economic Area (EEA).

The terms and conditions and usage policies, as well as privacy policies and other provisions of each platform operator, apply. These provisions inform in particular about the rights of affected persons directly against the respective platform, which includes the right to information.

For our **social media presence on Facebook** including so-called page insights – to the extent the General Data Protection Regulation (GDPR) applies – we are jointly responsible with Meta Platforms Ireland Limited (Ireland). Meta Platforms Ireland Limited is part of the [Meta Companies](#) (including in the USA). Page insights provide insight into how visitors interact with our Facebook presence. We use page insights to provide our social media presence on Facebook effectively and user-friendly.

Further information on the nature, scope, and purpose of data processing, as well as information on the rights of affected persons and contact details for Facebook and Facebook's data protection officer, can be found in the [Facebook privacy policy](#). We have entered into the so-called "[Controller Addendum](#)" with Facebook, particularly agreeing that Facebook is responsible for ensuring the rights of affected persons. For so-called page insights, the relevant information can be found on the "[Page Insights Information](#)" page, including "[Information about Page Insights Data](#)".

13. Services from Third Parties

We use services from specialized third parties to carry out our activities and operations in a continuous, user-friendly, secure, and reliable manner. With such services, we can embed functions and content in our website. For such embedding, the services used must, for technical reasons, at least temporarily collect the [IP addresses](#) of users.

For required security-relevant, statistical, and technical purposes, third parties whose services we use may process data related to our activities and operations in an aggregated, anonymized, or pseudonymized manner. This may include performance or usage data to provide the respective service.

We use in particular:

- **Google Services:** Providers: Google LLC (USA) / Google Ireland Limited (Ireland) for users in the European Economic Area (EEA) and Switzerland; General information on data protection: "[Privacy and Security Principles](#)", "[Information on how Google uses personal data](#)", [Privacy Policy](#), "[Google's Compliance with Applicable Data Protection Laws](#)", "[Data Protection Guide for Google Products](#)", "[How we use data from sites or apps that use our services](#)", "[Types of cookies and similar technologies used by Google](#)", "[Ads You Influence](#)" ("[Personalized Advertising](#)").
- **Microsoft Services:** Providers: Microsoft Ireland Operations Limited (Ireland) for users in the European Economic Area (EEA), Switzerland, and the United Kingdom / Microsoft

Corporation (USA) for users in the rest of the world; General information on data protection: ["Privacy at Microsoft"](#), ["Privacy and Data Protection"](#), [Privacy Statement](#), ["Privacy Settings"](#).

13.1 Digital Infrastructure

We use services from specialized third parties to provide the required digital infrastructure for our activities and operations. This includes hosting and storage services from selected providers.

We use in particular:

- **Cloudflare:** Content Delivery Network (CDN); Cloudflare Inc. (USA); Data protection information: ["Privacy"](#), [Privacy Policy](#), [Cookie Policy](#).
- **Infomaniak:** Hosting; Provider: INFOMANIAK NETWORK SA (Switzerland); Data protection information: ["Infomaniak and the Protection of Your Personal Data"](#), [Privacy Policy](#), [Cookie Policy](#), ["Certifications and Labels"](#).
- **Wix:** Website builder and other infrastructure; Providers: Wix.com Ltd. (Israel) together with Wix.com Ltd. (USA) / Wix.com Inc. (USA) / Wix.com Luxembourg S.à r.l. (Luxembourg); Data protection information: [Privacy Policy](#), ["Privacy & Security"](#), ["Wix Help Center Privacy"](#), including [Cookie Policy](#).
- **WordPress.com:** Blog hosting and website builder; Providers: Automattic Inc. (USA) / Aut O'Mattic A8C Ireland Ltd. (Ireland) for users in Europe; Data protection information: [Privacy Policy](#), [Cookie Policy](#).

13.2 Online Collaboration

We use third-party services to enable online collaboration. In addition to this privacy policy, the directly visible terms of use or privacy policies of the services may apply.

We use in particular:

- **Microsoft Teams:** Platform for productive collaboration, especially with audio and video conferencing; Provider: Microsoft; Teams-specific information: ["Security and Compliance in Microsoft Teams"](#), especially ["Privacy"](#).

13.3 Map Material

We use services from third parties to embed maps in our website.

We use in particular:

- **Google Maps** including **Google Maps Platform:** Map service; Provider: Google; Google Maps-specific information: ["How Google Uses Location Information"](#).
- **Outdooractive:** Map service; Provider: Outdooractive AG (Germany); Data protection information: [Privacy Policy](#).

13.4 Digital Content

We use services from specialized third parties to embed digital content in our website. Digital content includes images, videos, music, and podcasts.

We use in particular:

- **YouTube:** Video platform; Provider: Google; YouTube-specific information: "[Privacy and Security Center](#)", "[My Data on YouTube](#)".

13.5 Documents

We use services from third parties to embed documents in our website. Such documents may include PDFs, presentations, spreadsheets, and text files. This allows not only viewing but also editing or commenting on such documents.

We use in particular:

- **Yumpu:** Digital documents and electronic publications; Provider: i-Magazine AG (Switzerland); Data protection information: [Privacy Policy](#), [Cookie Policy](#).

13.6 Fonts

We use services from third parties to embed selected fonts as well as icons, logos, and symbols in our website.

13.7 E-Commerce

We engage in e-commerce and use services from third parties to successfully offer services, content, or goods.

We use in particular:

- **TOMAS:** Booking platform; Provider: my.IRS GmbH (Germany); Data protection information: [Privacy Policy](#).

13.8 Payments

We use specialized service providers to securely and reliably process payments from our customers. For payment processing, the legal texts of individual providers, such as terms of service or privacy policies, apply in addition.

We use in particular:

- **Payyo:** Payment processing for marketplaces and platforms in the leisure and tourism industry; Provider: TrekkSoft AG (Switzerland); Data protection information: [Privacy Policy](#).
- **Worldline:** Payment processing, particularly with mobile payment solutions; Providers: Worldline SA (France), Worldline Schweiz AG (Switzerland), and other Worldline companies worldwide (including in the USA); Data protection information: [Privacy Policy](#), "[Responsible Disclosure Program](#)", [Cookie Notice](#).

13.9 Advertising

We use the option of displaying **advertising on third-party platforms**, such as social media platforms and search engines, to promote our activities and operations.

We aim to reach people with such advertising who are already interested in our activities and operations or might be interested (**Remarketing** and **Targeting**). To this end, we may transmit relevant – potentially also personal – data to third parties that enable such advertising. We can also determine whether our advertising is successful, particularly if it leads to visits to our website (**Conversion Tracking**).

Third parties on which we advertise and with which you are registered as a user may associate your use of our website with your profile on those platforms.

We use in particular:

- **Google Ads:** Search engine advertising; Provider: Google; Google Ads-specific information: Advertising based on search queries, using various domain names – particularly doubleclick.net, googleadservices.com, and googlesyndication.com – for Google Ads, [Privacy Policy for Advertising](#), "[Manage Displayed Ads Directly Through Ads](#)".
- **Meta Ads:** Social media advertising on Facebook and Instagram; Providers: Meta Platforms Ireland Limited (Ireland) and [other Meta companies](#) (including in the USA); Data protection information: Targeting, including retargeting, particularly with **Meta Pixel** and **Custom Audiences**, including **Lookalike Audiences**, [Privacy Policy](#), "[Ad Preferences](#)" (login as a user required).

14. Success and Reach Measurement

We strive to measure the success and reach of our activities and operations. In this context, we may also measure the impact of third-party references or test the usage of different parts or versions of our online offer ("A/B Testing"). Based on the results of success and reach measurement, we can address errors, reinforce popular content, or make improvements.

In most cases, IP addresses of individual users are recorded for success and reach measurement. IP addresses are generally shortened ("IP Masking") to comply with data minimization principles through pseudonymization.

In success and reach measurement, cookies may be used, and user profiles may be created. Such user profiles may include the individual pages visited or content viewed on our website, screen or browser window size, and the – at least approximate – location. *Generally*, any created user profiles are pseudonymized only and not used to identify individual users. Some third-party services on which users are registered may link the use of our online offer to their respective user account or profile.

We use in particular:

- **Google Marketing Platform:** Success and reach measurement, especially with Google Analytics; Provider: Google; Google Marketing Platform-specific information: Measurement across different browsers and devices (**Cross-Device Tracking**) with pseudonymized IP addresses, which are only transferred fully to Google in the USA in *exceptional cases*, [Google Analytics Privacy Policy](#), "[Browser Add-on for Disabling Google Analytics](#)".
- **Google Tag Manager:** Integration and management of Google and third-party services, especially for success and reach measurement; Provider: Google; Google Tag Manager-specific information: [Google Tag Manager Privacy Policy](#); further data protection information can be found in the individual integrated and managed services.

15. Final Notes on the Privacy Policy

We created this privacy policy with the [Data Protection Generator](#) from [Datenschutzpartner](#). The present privacy policy is an unofficial translation from the original German version.

We may update this privacy policy at any time. We will inform about updates in an appropriate form, particularly by publishing the current privacy policy on our website.

