



# Mountain Network Privacy Statement

(version May 2018)

This is the Privacy Statement of Cave Holding B.V., with its registered offices at Nieuwe Kade 4, 6827 AA in Arnhem, registered with the trade register of the Chamber of Commerce under number 30118700, and of all its affiliated enterprises, which also operate under the name Mountain Network.

## Why this Privacy Statement?

Whenever you climb at one of our locations, whenever you book an alpine sport excursion with us, whenever you participate in a competition that we have organised, or when, for instance, you book a children's party with us, we require a number of personal details from you. We require this personal data to be able to perform our services optimally, to provide you with sufficient information and to offer you the right service.

In this Privacy Statement, we describe the way in which we approach the processing of your personal data. We list the information we process, our reasons for doing so and how we treat your information. We also describe your rights as regards our processing of your personal data.

Mountain Network treats your personal data with care and we do everything in our power to protect it. We comply with the regulations and legislation insofar as they concern personal data as they are set out in the General Data Protection Regulation (GDPR). Our staff are required to treat personal data confidentially.

Mountain Network reserves the right to amend this Privacy Statement should new developments in, for instance, the area of ICT, or changes to legislation and regulations give reason to do so. The most current version of our Privacy Statement will be available on our website. We recommend that you consult it from time to time.

## Which personal data do we process?

When you register to participate in an activity or purchase a membership through our website, or book a package or excursion with Mountain Network, we process your name, address, place of residence, telephone number, e-mail address, sex and date of birth.

Depending on the services of which you make use, we will also process the following information: bank account number, card/member number, visit registration, type of membership, your financial status with Mountain Network (i.e. purchased services and products, and whether they have been paid for), information regarding your skills as they apply to the activity you are participating in, information that may entitle you to discounts, and/or competition results.

In some cases, should you wish to participate in certain excursions or activities, we will ask you to provide a copy of your passport or proof of identity. If, in connection with certain excursions or activities, you provide us with information regarding your health, we will ask you for your express permission to process this special personal data. In the event that we have received data regarding your health, then we will only provide this data to third parties with your express permission.

We may take photos and/or shoot video during excursions, competitions or at one of our locations during the activities that take place there. This footage may be used on our website, in brochures, newsletters or on social media platforms.

When you agree to our General Terms and Conditions, you agree to this use of the footage we produce. Should you nevertheless object to our use of a photo, you may inform us thereof and we will do our utmost to remove the photo in question.

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## Why do we process your personal data?

### Services and contracts

We process your personal data for matters regarding your registration as a customer, or a booking that you have placed, such as the following: creating a membership card, sending quotations, answering questions, handling complaints, composing and issuing invoices, collecting membership fees, purchasing insurance, properly implementing our admission and safety policy, or keeping those who stay at home informed.

In addition, in order to provide you with an optimal level of service, we may need to inform you about matters concerning your membership, courses that you have registered to take, or about bookings that you have made.

Whenever you contact us or we contact you, be it by e-mail, telephone, chat or otherwise, the details of our exchange may be recorded. By doing so, our staff will be able to see whether there has been previous contact between us and if so, what it concerned. As a result, we will be better able to be of service and able to help you faster.

### Marketing and market research

In addition, we will inform you of other similar and further services and products offered by Mountain Network which may be of interest to you, as well as of a range of offers. This information will be provided by e-mail, in the newsletter or in our newspaper 'Op de Hoogte'. Should you not wish to receive this information, you can make your preference known to us at [privacy@mountain-network.nl](mailto:privacy@mountain-network.nl)

We may also use your personal data for research purposes and to perform analyses aimed at improving our services. With this objective in mind, we may also ask that you participate, without obligation, in a customer and/or market survey. Where market research or analyses are concerned, we will always first anonymise your data before we use it.

## How long do we retain your data?

We will retain your personal data for as long as you are an active customer and/or for the length of time that is required to meet the objectives for which we process it. We do not retain your data for longer than is legally permitted. The retention period may vary according to the type of personal data concerned.

## Do we provide your personal data to third parties?

In principle, Mountain Network neither provides nor sells personal data to third parties. We shall only do so in the event that we are required to by legislation or regulations, or if we have received your express permission to that end.

## In processing personal data, do we make use of third party services?

In processing your personal data, we may make use of the services of other parties. We are only permitted to share personal data with third parties if doing so is compatible with the above-mentioned objectives. To ensure that your data is handled with the same level of security and confidentiality, we conclude what is known as a processing agreement with organisations that process your data on our behalf. Nevertheless, we remain responsible for the processing of your data.

## Will we supply your data to a country or organisation outside the EU?

When you book an excursion or activity with us that is to take place outside the EU, then, in the context of this excursion or activity, we may be required to supply people or organisations outside the EU with certain personal data.

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## **Do we have a cookie policy?**

Through our website, Google Analytics issues cookies. The information generated by the cookie about your use of the website, including your IP address, is transferred to and by Google, and saved on servers in the United States of America. Google uses this information to monitor your use of the website, compose reports on the website activity for website owners, and to offer other services regarding website activity and Internet use. Google may provide third parties with this information in the event that it is legally required to do so, or insofar as these third parties process this information on Google's behalf. Google will not combine your IP address with other data it has in its possession.

## **How do we secure your personal data?**

Mountain Network has taken suitable organisational, technical and physical measures to protect the personal data that it processes against loss, destruction, unauthorised examination or any other form of wrongful processing thereof. We do this through, among other things, the application of access security, the use of usernames and passwords, and authorisation management (i.e. the application of a permissions structure that limits which staff may examine the data).

## **What are the consequences of not providing the personal data we request?**

Should we not receive all the required data from you, it may have consequences for the membership that you wish to conclude, or for the activity or excursion in which you wish to participate. It is possible that you may be unable to make use of our services, or that you are only permitted to make partial use thereof, or that you are not permitted to participate in an activity or excursion.

## **What rights do you have regarding the processing of your data?**

Your rights regarding the processing of your personal data have been set out in the GDPR. These rights are stated and briefly explained below.

### **Right of inspection**

You have a right to inspect your personal data. You are entitled to know what data we process and to which end.

### **Right to be forgotten and to restriction of processing**

You have a right to be forgotten. In other words, your personal data will be erased upon your request. You also have a right to a restriction of processing. A request to erase your data or to restrict its processing may be detrimental to your membership and consequently, you may no longer be permitted to participate in an activity or excursion.

### **Right to rectification**

You are entitled to have your data corrected should it be incorrect, or to have your data supplemented should it be incomplete.

### **Right to portability**

You have the right to have your data transferred and to receive your data in a structured and customary form that makes it possible to transfer it to a different organisation. This right only applies where electronic data is concerned. In other words, it does not apply to paper files. Furthermore, the right to data portability does not apply to all data that we have received. It only applies insofar as the data concerned is data that we have received your permission to process, or that we process in order to fulfil the agreement we have concluded with you.



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## Right to object

In the event that we process your personal data, you are entitled to object to said processing.

## Where can you turn with questions about the processing of your data?

If you have any questions, in the event that you wish to invoke your rights, or should you wish to submit a complaint regarding the processing of your data, please send an e-mail to:

[privacy@mountain-network.nl](mailto:privacy@mountain-network.nl)

Always be sure to clearly state the matter about which you are sending an e-mail, such as to ask a question, submit a complaint or invoke one of your rights. If you wish to invoke one of your rights, please state which right you wish to invoke. Be sure to also state your name, address and telephone number.

You will receive confirmation from us that we have received your e-mail. You will receive our substantive response no later than one month following said receipt.