



PRIVACY POLICY

PROCESSING OF YOUR PERSONAL DATA IN RELATION TO OUR PRODUCTS AND SERVICES

Visit Tromsø-Region AS ("Visit Tromsø", "our" or "we") by CEO Christopher Hudson is the data controller (The "Controller") for personal data processed under this Privacy Policy. We are responsible for processing your personal data in accordance with the Norwegian Personal Data Act, which implements the EU General Data Protection Regulation ("GDPR"). Our goal is to maintain a high level of integrity regarding all processing of personal data in connection with our products and services provided through our website/booking solutions.

For any questions or comments that you may have regarding the processing of your personal data, you may contact Visit Tromsø-Region AS on the following e-mail info@visittromso.no or phone number +47 776 10 000.

When you book various activities/accommodations through our booking system and/or contact us in other ways, Visit Tromsø-Region AS will process your personal data. Thus, please find information below as to why and how we process your personal data, and information concerning your specific rights in this respect. By making a booking via our booking system, the user acknowledges Visit Tromsø-Region AS' processing of personal data in accordance with the provisions below.

1. WHY WE PROCESS YOUR PERSONAL DATA AND WHAT INFORMATION WE COLLECT

Processing of personal data in our booking system

We process information in relation to your bookings/reservations. By ordering accommodation, travel activities or other products through our booking system, Visit Tromsø will register personal information. We collect your name, address, phone, e-mail, user history, place of residence/nationality, and payment/credit card information.

All personal data/credit card information is handled on an encrypted site (SSL 128 bit), so all information provided is secure. In some instances, the supplier of the activity/product needs information about their guests specific to their booking, such as e.g. information related to dress size, food requests, height, weight etc. The processing of your personal data is necessary in order to fulfil our agreement with you (GDPR art. 6 (1) b) We also collect your date of birth in cases where this is necessary out of mandatory security requirements. This is based on our legitimate interest (GDPR art. 6 (1) f).

Processing of personal data in relation to market/travel surveys

We process information while conducting market/travel surveys. We collect your name, phone number and e-mail. Our processing is based on your consent (GDPR art. 6 (1) a). You may withdraw your consent at any given time by sending us an e-mail to info@visittromso.no.

Processing of personal data concerning contact persons of suppliers and collaborators

We process contact information concerning the representatives of our various suppliers and collaboration partners. We collect name, e-mail address, telephone number and other contact

information provided. This is necessary in order for us to fulfil our contractual obligations to our suppliers and collaboration partners (GDPR art. 6 (1) b).

Processing of personal data following various inquiries from you

We may also process information in order to respond to inquiries which we receive from you. We collect your name, phone number, e-mail address and any other personal data that may be the result of your request. The processing is based on our legitimate interest (GDPR art. 6 (1) f). We are of the opinion that the processing of personal data is necessary to respond to the inquiries we receive.

Processing of personal data in e-mails

The processing is based on our legitimate interest (GDPR art. 6 (1) f). The processing of your personal data in e-mail correspondence is necessary for day-to-day communications both internally and with external parties.

Cookies

Our website uses cookies. You may read more about cookies and what cookies we apply in our [Cookie Policy](#). The processing of data is based on our legitimate interests (GDPR art. 6 (1) f) and is done in order to adapt our website to the users preferences. Information is gathered for statistical purposes and it is not possible to identify you as an individual.

2. SHARING YOUR PERSONAL DATA

We will not share your personal data with others unless there is a legal basis for such disclosure. This could be your consent, an agreement with you or a statutory requirement.

When you book various travel activities/package tours, events or overnight stays through our booking system Citybreak, please note that the relevant information necessary to provide the service/product will be shared with our suppliers that are to deliver the respective services/travel products. We do not distribute your personal data to anyone other than those suppliers who need such information in order to provide the product or service booked by you.

Visit Tromsø-Region AS uses data processors to collect, store or in other ways process personal data on our behalf. Our booking system Citybreak is provided by Visit Technology Group AB. Please note that we have entered into a data processing agreement with the supplier of the system ensuring compliance with applicable information security requirements.

Moreover, we may be obliged to disclose personal data to other third parties such as the police or another public authority, if this is connected to the investigation of a crime, or if Visit Tromsø-Region AS is required to disclose such information by law or by decision from a public authority.

3. TRANSFER TO THIRD COUNTRIES OUTSIDE THE EU/EEA-AREA

We only perform processing of personal data within the EU/EEA-area.

4. STORAGE TIME

We will store your personal data for as long as there is a basis for the processing and it is necessary in order to fulfil the purpose for which the personal data was collected. For example, this means that personal data provided to us on the basis of your consent will be erased, if you withdraw your consent. Personal data processed by us to fulfil an agreement with you is normally erased once the

agreement has been fulfilled and all obligations arising from the contractual relationships have been met.

Please observe that personal data in relation to your bookings in our booking system Citybreak normally will be stored for two years from departure date.

Any personal data collected in relation to market/travel surveys are deleted or anonymized once the survey is completed.

5. HOW IS YOUR PERSONAL DATA PROTECTED?

Visit Tromsø-Region AS has implemented appropriate technical and organizational measures for the protection of your personal data to ensure that only authorized persons are granted access to it.

6. YOUR RIGHTS WHEN WE PROCESS PERSONAL DATA

Under the Personal Data Act and the EU's General Data Protection Regulation, you have a number of rights in relation to our processing of personal data about you.

- *Right of access*
You have the right to access the personal data processed by us, as well as certain additional information.
- *Right to rectification*
You have the right to have inaccurate personal data rectified.
- *Right to erasure*
In certain circumstances you have the right to have personal data erased before the time when our ordinary general erasure occurs.
- *Right to restriction of processing*
You have the right to have the processing of your personal data restricted in certain circumstances.
- *Your right to object*
You have the right to object to our processing of your personal data in certain circumstances.
- *Data portability*
In certain circumstances you have the right to get your personal data in a structured, generally applicable and machine-readable format, as well as to get this personal data transferred from one data controller to another without any obstacles.

Please note that if the processing of personal data is based on your consent, you have the right to withdraw your consent at any time.

Please visit the website of the Norwegian Data Protection Authority (NW:"Datatilsynet") www.datatilsynet.no for more information regarding your rights.

You can exercise any one of these rights by contacting our privacy contact on the contact information above or send an e-mail to info@visittromso.no.

We will respond to your inquiry as soon as possible and no later than within 30 days upon receiving your request.

We may ask you to verify your identity or provide further information before we allow you to exercise these rights. We do this to make sure that we only provide access to your personal data to you – and not to someone who claims to be you.

7. COMPLAINTS

If you believe that we have not observed your rights under the Personal Data Act, you are entitled to complain to the relevant supervisory authority. This should be done by sending a complaint to the Norwegian Data Protection Authority. Contact information is available at www.datatilsynet.no.

8. CHANGES TO THIS PRIVACY POLICY

In the event of changes to our services or changes in the regulations relating to the processing of personal data, this could result in changes to the information provided to you here. If we have your contact details, we will notify you of these changes. Otherwise, up-to-date information will always be readily available on our website.

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9. CONTACT INFORMATION

If you have any questions or comments to this privacy policy or want to exercise your rights, please find our contact info below:

Address:	Visit Tromsø-Region AS Samuel Arnesens gate 5 Postbox 311 9253 TROMSØ
E-mail:	info@visittromso.no
Telephone:	+47 77 61 00 00
Business register number:	994 311 352

This privacy policy was last updated in August 2020.