

Privacy Policy

Last update: September 10, 2026

Thank you for your interest in the information on our website!

With the help of this Privacy Policy we would like to inform the users of our website about the type, scope and purpose of the personal data processed. Personal data in this context is all information that can be used to personally identify you as a user of our website (theoretically in an alternative way or by linking various data), including your IP address. Information that is stored in cookies is generally not or only in exceptional cases personally identifiable; however, cookies are covered by specific regulations that makes the permissibility of the use of cookies dependent on their purpose to a large extent on the active consent of the user.

In a general section of this Privacy Policy, we provide you with information on data protection, which generally applies to our processing of data, including data collection on our website. In particular, you as a data subject will be informed about the rights to which you are entitled.

The terms used in our Privacy Policy and our data protection practice are based on the provisions of the EU General Data Protection Regulation ("GDPR") and other relevant national legal provisions.

Controller according to the GDPR

Promontoria Hochgurgl GmbH - TOP Hotel Hochgurgl - Hochgurglerstraße 8 - 6456 Hochgurgl

Registration Number: 572482 k

Registering court: Handelsgericht Wien

Teinfaltstraße 8/4

1010 Wien

Austria

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t: +43 5256 6265

Data collection on our website

On the one hand, personal data is collected from you when you expressly communicate such data to us, on the other hand, data, especially technical data, is automatically collected when you visit our website. Some of this data is collected to ensure that our website functions without errors. Other data may be used for analysis purposes. However, you can use our website without a need to provide personal information.

Technologies on our website

Cookies and Local Storage

We use cookies to make our website as user-friendly and functional as possible for you. Some of these cookies are stored on the device you use to access the site.

Cookies are small packages of data that are exchanged between your browser and our web server whenever you visit our website. They do not cause any damage and are used solely to recognise website visitors. Cookies can only store information provided by your browser, e.g. information that you have entered into your browser or that is available on the website. Cookies cannot execute code and cannot be used to access your terminal device.

The next time you access our website using the same device, the information stored in the cookies can then either be sent back to us (“first-party cookie”) or to a web application of third party to whom the cookie belongs (“third-party cookie”). The information that is stored and sent back allows each web application to recognise that you have already accessed and visited the website using the browser on your device.

Cookies contain the following information:

- Cookie name
- Name of the server from which the cookie originates
- Cookie ID number
- An expiry date, after which the cookie will be automatically deleted

We classify cookies in the following categories depending on their purpose and function:

- Technically necessary cookies, to ensure the technical operation and basic functions of our website. These types of cookies are used, for example, to maintain your settings while you navigate our website; or they can ensure that important information is retained throughout the session (e.g. login, shopping cart).
- Statistics cookies, to understand how visitors interact with our website by collecting and analysing information on an anonymous basis only. In this way we gain valuable insights to optimize both the website and our products and services.
- Marketing cookies, to provide targeted promotional and marketing activities for users on our website.
- Unclassified cookies are cookies that we are trying to classify together with individual cookie providers.

Depending on the storage period, we also divide cookies into session and persistent cookies. Session cookies store information that is used during your current browser session. These cookies are automatically deleted when the browser is closed. No

information remains on your device. Persistent cookies store information between two visits to the website. Based on this information, you will be recognized as a returning visitor on your next visit and the website will react accordingly. The lifespan of a persistent cookie is determined by the provider of the cookie.

The legal basis for using technically necessary cookies is our legitimate interest in the technically fault-free operation and smooth functionality of our website. The use of statistics and marketing cookies is subject to your consent. These technologies are only activated after you have provided explicit consent via the cookie banner. You can withdraw your consent for the future use of cookies at any time. Your consent is voluntary. If consent is not given, no disadvantages arise. For more information about the cookies we actually use (specifically, their purpose and lifespan), refer to this Privacy Policy and to the information in our cookie banner about the cookies we use.

You can also set your web browser so that it does not store any cookies in general on your device or so that you will be asked each time you visit the site whether you accept the use of cookies. Cookies that have already been stored can be deleted at any time. Refer to the Help section of your browser to learn how to do this.

Please note that a general deactivation of cookies may lead to functional restrictions on our website.

On our website, we also use so-called local storage functions (also called "local data"). This means that data is stored locally in the cache of your browser, which continues to exist and can be read even after you close the browser - as long as you do not delete the cache or data is stored within the session storage.

Third parties cannot access the data stored in the local storage. If special plug-ins or tools use the local storage functions, you are informed within the description of the respective plug-in or tool.

If you do not wish plug-ins or tools to use local storage functions, you can control this in the settings of your respective browser. We would like to point out that this may result in functional restrictions.

Hosting

In the context of hosting our website, all data that arises in connection with the operation and use of the website is processed. This includes, in particular, content data, usage data, communication data, and technical data that are necessary for providing and securely operating the website.

The storage and processing of this data is necessary to enable access to the website, ensure the stability and security of the online offering, and to technically optimize the website.

To provide our online presence, we use the services of external web hosting providers. In this context, the data generated during the operation of the website is transmitted to these service providers or processed by them on our behalf. Processing is carried out exclusively in accordance with legal requirements and based on contractual agreements for data processing on behalf.

Further information on the handling of personal data in connection with hosting can be found in the privacy policy of this website.

Google Tag Manager

Provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland,

Parent company: Google LLC (USA)

Purpose: Launching Tools and Plugins

Category: Technically Required

Recipients: EU, USA (possible)

Data processed: IP Address

Data subjects: User

Technology: JavaScript Call

Legal basis: legitimate interest, Data Privacy

Framework, <https://www.dataprivacyframework.gov/s/participant-search/participant-detail?id=a2zt0000000001L5AAI&status=Active>

Website: <https://www.google.com>

Further information:

<https://policies.google.com/privacy>

<https://safety.google/intl/en/principles/>

<https://business.safety.google/adsprocessorterms/>

Here you can find out where exactly Google data centers are

located: <https://www.google.com/about/datacenters/locations/>

The Google Tag Manager service is used on our website.

The Tag Manager is a service that allows us to manage website tags via an interface. This allows us to include code snippets such as tracking codes or conversion pixels on websites without interfering with the source code. In doing so, the data is only forwarded by the Tag Manager, but neither collected nor stored. The Tag Manager itself is a cookie-less domain and serves purely to manage other services in our online offering.

When the Google Tag Manager is started, the browser establishes a connection to Google's servers. These are mainly located in the U.S. Through this, Google obtains knowledge that our website was called up via the IP address of a user.

The Tag Manager ensures the resolution of other tags, which in turn may collect data. However, the Tag Manager does not access this data. If a deactivation has been made

at the domain or cookie level, this remains in place for all tracking tags that are implemented with the Tag Manager.

Contact

Our website offers various options for contacting us, for example via contact forms or e-mail addresses provided. When contacting us, the personal data provided will be processed exclusively for the purpose of processing and responding to the respective inquiry. The processing takes place insofar as this is necessary to carry out pre-contractual measures or to fulfill a contract, or on the basis of legitimate interests, for example to maintain customer relationships or to document processes.

It may be necessary to provide certain data in order to fully process an inquiry. Without this information, it may not be possible to process the request, or only to a limited extent.

Personal data from contact requests may also be stored in a customer or prospective customer database on the basis of legitimate interests in order to optimize communication and support. Use for marketing purposes only takes place if separate consent has been obtained or a legitimate interest exists and there are no overriding interests of the data subject that require protection.

Personal data from contact inquiries will only be stored for as long as is necessary for the processing and handling of the inquiry or for as long as there are statutory retention obligations. After final processing of the inquiry and expiry of any legal deadlines, the data will be deleted or anonymized. As a rule, deletion takes place at the latest after three years without further contact, unless there are longer statutory or contractual retention obligations.

Additional information on the rights of data subjects and the relevant contact details are listed in the general section of this privacy policy.

Meta Pixel

Provider: Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, e-mail: privacy@facebook.com

Parent company: Meta Platforms, Inc, 1601 Willow Road, Menlo Park, CA 94025, USA

Purpose: Web analysis, tracking (conversion)

Category: Marketing

Recipient: EU, USA

Processed data: Visitor data (e.g. IP address, location data), behavioral data (e.g. clicks, duration of visit, conversion data), device data (e.g. browser type, operating system), e-commerce data (e.g. order ID, product information)

Data subjects: Website visitors

Technology: JavaScript, cookies (details in the cookie list), tracking pixels

Legal basis: Consent (purpose)

Certifications: EU-U.S. Data Privacy Framework, Swiss-U.S. Data Privacy Framework,

UK Extension to the EU-U.S. Data Privacy Framework

Website: <https://www.facebook.com/business/tools/meta-pixel>

Further information:

<https://www.facebook.com/privacy/policy/>

<https://www.facebook.com/legal/terms>

The Meta Pixel service of the social network Facebook is used on our website for the analysis, optimization and economic operation of our online offer.

With the help of Meta Pixel, it is possible for Meta to determine the visitors to our website as a target group for the display of personalized ads. Accordingly, we use Meta Pixel to display the advertisements placed by us only to those users who have also shown an interest in our online offering or who have certain characteristics (e.g. interests in certain topics or products determined on the basis of the websites visited) that we transmit to Meta (so-called “custom audiences”). With the help of Meta Pixel, we also want to ensure that our meta ads correspond to the potential interest of users and are not annoying. With the help of Meta Pixel, we can also track the effectiveness of the Meta Ads for statistical and market research purposes by seeing whether users were redirected to our website after clicking on a meta ad (so-called “conversion”).

The actions of users are stored in one or more cookies. These cookies make it possible to match Meta user data (such as IP address, user ID) with the data of a Facebook account. The data collected is anonymous and not visible to us and can only be used in the context of advertisements. Users can prevent the link to their Facebook account by logging out before taking any action.

To set which types of ads are displayed within Facebook, users can go to the page set up by Meta and follow the instructions on the settings for usage-based advertising: <https://www.facebook.com/settings?tab=ads>

The settings are platform-independent, i.e. they are applied to all devices, such as desktop computers or mobile devices.

Additional details can be found in the linked further information. It is recommended that you check these links regularly for changes, as Meta may update its functions and privacy policy. Further information on rights and contact details can be found in the general section of this privacy policy.

Server-Logfiles

Category: General processing activity

Purpose: Technical security, stability, and error analysis

Data types: Technical connection data and access data

Data subjects: Visitors to the online offering

Recipients: Hosting providers or technical service providers

Technologies: Server logs

Legal basis: Legitimate interest (technical operation & security)

When you visit our website, so-called server log files are automatically created. These log files contain the following data, which is automatically transmitted by the browser:

- IP address
- Date and time of access
- File or page accessed
- Amount of data transferred
- Notification of successful retrieval
- Browser type and version used
- Operating system used
- Referrer URL (previously visited page)
- Host name of the accessing device

This data is processed to ensure the functionality, security, and stability of our website, in particular to defend against or track attacks (e.g., DDoS attacks), for error analysis, and for the technical provision of the website. The legal basis for this is a legitimate interest in the secure and error-free provision of the website.

The log file data is automatically deleted after a standard technical period – after 12 weeks at the latest– once it is no longer required for the aforementioned purposes. Longer storage may occur in individual cases if data is required for evidence purposes (e.g., to investigate security-related incidents). This data is not merged with other data sources.

SSL Encryption

Within your visit to our website, we use the widespread SSL procedure (Secure Socket Layer) in conjunction with the highest level of encryption supported by your browser. You can tell whether an individual page of our website is transmitted in encrypted form by the closed representation of the key or lock symbol in the lower status bar of your browser. We use this encryption procedure on the basis of our justified interest in the use of suitable encryption techniques.

We also make use of suitable technical and organisational security measures to protect your data against accidental or intentional manipulation, partial or complete loss, destruction or against unauthorised access by third parties. Our security measures are continuously improved in line with technological developments and kept state-of-the-art.

Webcare

Provider: DataReporter GmbH, Zeileisstraße 6, 4600 Wels, Austria.
Purpose: Consent Management
Category: technically required
Recipient: EU, AT
Data processed: IP Address, Consent Data
Data subjects: Users
Technology: JavaScript call, Cookies, Swarmcrawler
Legal basis: Legitimate interest, consent (swarmcrawler to evaluate search results)
Website: <https://www.datareporter.eu/>
Further information: <https://www.datareporter.eu/company/info>

On our website, we use the Webcare tool for consent management. Webcare records and stores the decision of each user of our website. Our Consent Banner ensures that statistical and marketing technologies such as cookies or external tools are only set or started if the user has expressly consented to their use.

We store information on the extent to which the user has confirmed the use of cookies. The user's decision can be revoked at any time by accessing the cookie setting and managing the declaration of consent. Existing cookies are deleted after revocation of consent. For the storage of information about the status of the consent of the user, a cookie is also set, which is referred to in the cookie details. Furthermore, the IP address of the respective user(s) is transmitted to DataReporter's servers when this service is called up. The IP address is neither stored nor associated with any other data of the user, it is only used for the correct execution of the service.

With the help of Webcare, our website is regularly checked for technologies relevant to data protection. This investigation is only carried out for those users who have expressly given their consent (for statistical or marketing purposes). The search results of the users are evaluated by Webcare in an anonymous form and only in relation to technologies and used for the fulfillment of our information obligations. To start the Swarmcrawler technology, a request is sent to our servers and the IP address of the user is transmitted for the purpose of data transfer. Servers are selected which are geographically close to the respective location of the user. It can be assumed that for users within the EU, a server with a location within the EU will also be selected. The IP address of the user is not stored and is removed immediately after the end of the communication.

General information on data protection

The following provisions in its principles apply not only to the data collection on our website, but also in general to other processing of personal data.

Personal data

Personal data is information that can be assigned to you individually. Examples include your address, your name as well as your postal address, email address or

telephone number. Information such as the number of users who visit a website is not personal data because it is not assigned to a person.

Legal basis for the processing of personal data

Unless more specific information is provided in this Privacy Policy (e.g. in the case of the technologies used), we may process personal data from you on the basis of the following legal principles:

- **consent in accordance with Art. 6 paragraph 1 lit. a of the GDPR** - The data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes.
- **Fulfillment of a contract and pre-contractual measures pursuant to Art. 6 paragraph 1 lit. b of the GDPR** - Processing is necessary for the fulfillment of a contract to which the data subject is a party or for the implementation of pre-contractual measures.
- **Legal obligation pursuant to Art. 6 paragraph 1 lit. c of the GDPR** - Processing is necessary for the performance of a legal obligation.
- **Protection of vital interests pursuant to Art. 6 paragraph 1 lit. d of the GDPR** - Processing is necessary to protect the vital interests of the data subject or of another natural person.
- **Reasonable interests pursuant to Art. 6 paragraph 1 lit. f of the GDPR** - The processing is necessary to protect the legitimate interests of the controller or of a third party unless the interests or fundamental rights and freedoms of the data subject prevail.

Please note that in addition to the provisions of the GDPR, national data protection regulations may apply in your or our home country.

Transfer of personal data

Your personal data will not be transferred to third parties for purposes other than those listed in this Privacy Policy.

We will only transfer your personal data to third parties if:

- you have given your express **consent** in accordance with **Art. 6 paragraph 1 lit. a of the GDPR**,
- the transfer pursuant to **Art. 6 paragraph 1 lit. f of the GDPR** is necessary to safeguard **reasonable interests**, as well as to assert, exercise or defend legal claims and there is no reason to assume that you have a prevailing interest worthy of protection by not disclosing your data,
- there is a **legal obligation** to transfer the data in accordance with **Art. 6 paragraph 1 lit. c of the GDPR**, as well as this is legally permissible and / or

- it is required according to **Art. 6 paragraph 1 lit. b of the GDPR** for the **processing of contractual relationships** with you.

Cooperation with processors

We carefully select our service providers who process personal data on our behalf. If we commission third parties to process personal data on the basis of a data processing agreement, this is done in accordance with **Art. 28 of the GDPR**.

Transfer to third countries

If we process data to a third country or if this is done in the context of using the services of third parties or disclosure or transfer of data to other persons or companies, this is only done on the legal basis described above for the transfer of data.

Subject to express consent or contractual necessity, we process or allow data to be processed only in third countries in accordance with **Art. 44 - 49 of the GDPR** with a recognized level of data protection or on the basis of special guarantees, such as contractual obligations through so-called standard contractual clauses of the EU Commission, the existence of certifications or binding corporate rules.

Data transfer to the U.S.

We would like to explicitly point out that as of July 10, 2023, the EU Commission has issued an adequacy decision on the EU-US data protection framework (Data Privacy Framework) pursuant to Art. 45 paragraph 1 GDPR. Accordingly, organizations or companies (as data importers) in the US that are registered in a public list as part of the self-certification of the Data Privacy Framework provide an adequate level of protection for data transfers. Whether the specific provider of a service is already certified can be found here: <https://www.dataprivacyframework.gov/s/participant-search>

The Data Privacy Framework provides a valid legal basis for the transfer of personal data to the USA. This creates binding guarantees to comply with all ECJ requirements; for example, it provides that access by U.S. intelligence services to EU data is limited to a necessary and proportionate level and that a data protection review court is created to which individuals in the EU also have access.

If a transfer of data by us to the US takes place at all or if a service provider based in the US is used by us, we refer to this explicitly in this Privacy Policy (see in particular the description of the technologies used on our website).

It should be noted that aside from significant improvements, the Data Privacy Framework is only partial and only applies to data transfers to those data importers in the U.S. that appear on the public list of certified organizations/companies.

What can the transfer of personal data to the US mean for you as a user and what risks are involved?

Risks for you as a user as far as data importers in the USA are concerned, which are not covered by the Data Privacy Framework, are in any case the powers of the US secret services and the legal situation in the U.S., which currently, according to the European Court of Justice, no longer ensure an adequate level of data protection. Among others, these are the following:

- Section 702 of the Foreign Intelligence Surveillance Act (FISA) does not provide for any restrictions on the surveillance measures of the secret services or guarantees for non-US citizens.
- Presidential Policy Directive 28 (PPD-28) does not provide effective remedies for those affected against actions by U.S. authorities and does not provide barriers to ensuring proportionate measures.
- The ombudsman provided for in the Privacy Shield does not have sufficient independence from the executive; he cannot issue binding orders to the U.S. secret services.

Legally compliant transfer of data to the U.S. on the basis of the standard contractual clauses for data importers not covered by the Data Privacy Framework?

In June 2021, the European Commission adopted new Standard Contractual Clauses (SCC) in Decision 2021/914/EU. These create a new legal basis for data transfers where the level of data protection is not the same as in the EU.

Legally compliant transfer of data to the U.S. based on consent?

If a data transfer to a service provider based in the U.S. takes place that is not covered by the Data Privacy Framework and this data transfer is based on explicit consent, we provide explicit information about this in this privacy policy, in particular in the description of the technologies used on our website.

What measures do we take to ensure that data transfers to the U.S. are legally compliant?

Where US providers offer the option, we choose to process data on EU servers. This should technically ensure that the data is located within the European Union and that access by US authorities is not possible.

Storage periods in general

If no explicit storage period is specified during the collection of data (e.g. in the context of a declaration of consent), we are obliged to delete personal data in accordance with **Art. 5 paragraph 1 lit. e of the GDPR** as soon as the purpose for processing has been fulfilled. In this context, we would like to point out that legal

storage obligations represent a legitimate purpose for the further processing of affected personal data.

Personal data will be stored and retained by us in principle until the termination of a business relationship or until the expiry of any applicable guarantee, warranty or limitation periods, in addition, until the end of any legal disputes in which the data is required as evidence, or in any event until the expiry of the third year following the last contact with a business partner.

Storage periods in particular

As part of the description of individual technologies on our website, there are specific references to the storage period of data. In our cookie table, you will be informed about the storage period of individual cookies. In addition, you always have the possibility to ask us directly about the specific storage period of data. To do so, please use the contact data listed in this Privacy Policy.

Rights of data subjects

Data subject have the right:

- (i) **in accordance with Art. 15 of the GDPR, to request information** about your personal data processed by us. In particular, you may request information on the purposes of processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned duration of storage, the existence of a right of rectification, deletion, restriction of processing or opposition, the existence of a right of appeal, the origin of your data, if not collected by us, as well as the existence of automated decision making including profiling and, where applicable, meaningful information on the details thereof;
- (ii) **in accordance with Art. 16 of the GDPR, to demand without delay the correction** of incorrect or incomplete personal data stored by us;
- (iii) **in accordance with Art. 17 of the GDPR, under specific circumstances** to demand the **deletion** of your personal data stored with us, unless the processing is necessary to exercise the right to freedom of expression and information, to fulfill a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims;
- (iv) **in accordance with Art. 18 of the GDPR, to demand the (temporary) restriction of the processing** of your personal data, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you refuse to delete it and we no longer require the data, but you require it for the assertion, exercise or defense of legal claims or you have lodged an objection to the processing in accordance with Art. 21 of the GDPR;

- (v) **in accordance with Art. 20 of the GDPR**, to receive your personal data that you have provided to us in a structured, common and machine-readable format or to request that it be transferred to another controller; However, this only covers those of your personal data that we process with the help of automated processes after your consent or on the basis of a contract with you;
- (vi) **in accordance with Art. 21 of the GDPR**, if your personal data are processed on the basis of our legitimate interest, **to object** to the processing of your personal data for reasons arising from your specific situation or if the objection is directed against direct advertising. In the latter case, you have a general right of objection, which we will implement without indicating a specific situation.
- (vii) **in accordance with Art. 7 paragraph 3 of the GDPR**, you may at any time **revoke your consent** to us. As a result, we may no longer continue the data processing based on this consent in the future. Among other things, you have the option of revoking your consent to the use of cookies on our website with effect for the future by calling up our [Cookie Settings](#).
- (viii) **in accordance with Art. 77 of the GDPR to complain** to a data protection authority regarding the illegal processing of your data by us. As a rule, you can contact the data protection authority at your usual place of residence or workplace or at the headquarters of our company.

[The responsible data protection authority for Promontoria Hochgurgl GmbH is:](#)

Österreichische Datenschutzbehörde

Barichgasse 40-42, 1030 Wien, Österreich

Tel.: +43 1 52 152-0, dsb@dsb.gv.at

Assertion of rights of data subjects

You yourself decide on the use of your personal data. Should you therefore wish to exercise one of your above-mentioned rights towards us, you are welcome to contact us by email at datenschutz@tophotelhochgurgl.com or by post, as well as by telephone.

Please assist us in specifying your request by answering questions from our responsible employees regarding the specific processing of your personal data. If there are reasonable doubts about your identity, we may request a copy of your identification.

For questions regarding data protection, you can reach us at datenschutz@tophotelhochgurgl.com or at the other contact details stated in this Privacy Policy.