

ADVENTURE HAS NO LIMITS. YOUR FREE TIME DOES.

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Alpenventures UNGUIDED – Data Collection, Retention and Deletion Policy

Data is collected and retained for 2 primary purposes:

- 1) Marketing
- 2) Booking

Marketing Data

Data Collection: Data collected for marketing is restricted to name, email address and in some cases, country of residence.

Data Retention: Marketing information is stored only for marketing purposes within Alpenventures' authorized systems, including MailerLite, WordPress (where applicable), and Alpenventures' encrypted Customer Database. Access is restricted to authorized personnel.

Data Sharing: Marketing data is not sold or disclosed to third parties for their own marketing purposes. Service providers acting on behalf of Alpenventures process this data only under appropriate data processing agreements where required by the GDPR.

Data Deletion: Marketing data is deleted upon request, when consent is withdrawn, or when an individual unsubscribes from marketing communications. Where legally required, suppression records may be retained to ensure future marketing communications are not sent to individuals who have opted out.

Booking Data

Purpose of Processing: Booking data is processed solely for the purpose of arranging, managing and delivering the customer's booked travel services, communicating with customers regarding their booking, complying with applicable legal obligations, processing payments, refunds and reservation

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modifications, providing customer support, and maintaining required business records.

Data Collection: Booking data is collected through the TourCMS online booking platform, which is used to process customer reservations for Alpenventures GmbH tours. TourCMS uses encrypted HTTPS/SSL connections to protect personal data transmitted during the booking process. Depending on the customer's booking and the services requested, personal data collected may include: name, email address, telephone number, postal address (street, city, state/province, postal code and country), gender, date of birth, passport number (where required), nationality, dietary restrictions, emergency contact information (if voluntarily provided), and booking preferences and special requests relevant to the customer's tour.

Special Category Data: Where customers voluntarily provide dietary requirements, food allergies, mobility information or other health-related information necessary to safely operate their tour or arrange requested services, Alpenventures processes such information solely for those purposes and only to the extent necessary. This information is shared only with suppliers who require it to provide the requested services.

Third-Party Processors: Alpenventures engages carefully selected third-party service providers to support the operation of its business, including booking management, customer communications, marketing, website operation and digital navigation services. Where these providers process personal data on behalf of Alpenventures, appropriate contractual safeguards, including Data Processing Agreements where required by the GDPR, are maintained.

Data Retention: Booking information is stored only in systems required to operate the customer's booking and meet our contractual and legal obligations. Depending on the booking, this may include: The TourCMS booking platform; Alpenventures' Microsoft 365 email system, where booking confirmations and operational communications are received and retained; Alpenventures' encrypted Customer Database (hosted in Microsoft Access); Financial and accounting records maintained to comply with statutory retention requirements.

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Data Security: Alpenventures implements appropriate technical and organizational measures to protect personal data against unauthorized access, alteration, disclosure or destruction. Access to personal data is restricted to authorized personnel whose responsibilities require access to such information. Access to booking information is limited to authorized Alpenventures personnel who require the information to perform their duties.

Customer Communications: Communications relating to bookings, customer support, operational updates and tour arrangements may be retained within Alpenventures' authorized communication systems, including Microsoft 365, TourCMS and other approved business communication platforms, for as long as reasonably necessary to provide customer service, fulfill contractual obligations, resolve disputes and comply with legal recordkeeping requirements.

Data Sharing: Alpenventures GmbH arranges accommodation, transportation and other travel services on behalf of our customers. Personal data is shared only where necessary to deliver the booked services or to comply with applicable legal obligations.

In most cases, only the customer's name is provided to service providers. Where additional personal information is required, only the minimum information necessary is shared.

Examples include:

- GDPR-compliant local partners who operate or assist with tours booked through Alpenventures.
- Hotels or accommodation providers where nationality, passport information or date of birth is required by local law.
- Transportation providers (such as Deutsche Bahn or SBB) where passenger information is legally or operationally required.
- Where customers choose to use the Outdooractive navigation app, Alpenventures will provide the customer's email address to Outdooractive solely for the purpose of creating or linking their Outdooractive account and providing digital navigation materials for their tour. This information is shared only with the customer's explicit consent. Customers may choose to

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opt in during the booking process or subsequently through a confirmation email sent prior to their tour. Participation is entirely voluntary and customers may withdraw their consent at any time prior to their account being created. Once the customer's information has been shared with Outdooractive, the processing of personal data by Outdooractive is governed by Outdooractive's own Privacy Policy. Customers who do not wish to use Outdooractive may decline participation without affecting any other part of their booking.

- In certain circumstances, Alpenventures may reassign an existing reservation from one customer to another, for example following a customer cancellation or where an existing reservation can be used for another customer. Where necessary to facilitate the reassignment with accommodation providers, transportation companies, or other suppliers, Alpenventures may disclose the last name under which the original reservation was made to the new customer. Only the minimum personal data necessary to complete the reassignment is shared.
- Other suppliers where personal information is required to fulfill the customer's booking or comply with applicable legal requirements.

Where personal data is transferred outside the European Economic Area, Alpenventures ensures that appropriate safeguards are in place in accordance with the GDPR.

Data Deletion: Alpenventures follows the principle of data minimization and retains personal data only for as long as necessary.

Sensitive personal information is retained only for as long as reasonably necessary for operational purposes and applicable legal obligations.

Specifically:

- Passport numbers, dates of birth and similar sensitive identification information stored within Alpenventures' operational customer database are removed within one year following completion of the customer's tour unless a longer retention period is required by law.

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- Operational emails containing sensitive personal information are periodically reviewed and deleted once no longer required.
- Financial records, invoices and accounting documentation are retained for the statutory retention periods required under German commercial and tax law (generally ten years) and are not deleted before those legal obligations expire.
- Customers may request deletion of personal data where legally permissible. However, Alpenventures may retain information where required to comply with contractual, legal, accounting or regulatory obligations.
- Certain records cannot be deleted immediately where Alpenventures is required by German commercial, tax or other applicable laws to retain them for statutory retention periods.

Data Subject Rights

Customers may request access to, correction of, restriction of processing, deletion or portability of their personal data, subject to applicable legal limitations. Customers may also withdraw any consent previously provided where processing is based on consent. Requests should be directed to service@alpenventuresUNGUIDED.com. Additional information regarding data subject rights is available in Alpenventures' Privacy Policy.

Policy Review

This policy is reviewed periodically and additionally whenever required by changes in applicable law or Alpenventures' processing activities.

This policy was last updated on July 2, 2026. Any questions should be directed to service@alpenventuresUNGUIDED.com.

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Appendix - Data Processing Systems

System	Purpose	Typical Categories of Personal Data
TourCMS	Booking management	Booking information
Microsoft 365	Customer communications	Customer communications
Microsoft Access	Encrypted customer database	Booking and communication records
MailerLite	Marketing	Name, email
Outdooractive	Navigation (opt-in)	Email address
WordPress	Marketing forms	Marketing data

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