

# Gravitat Privacy Policy

The following Gravitat privacy policy (the 'Privacy Policy') provides an overview of our processing of your personal data as part of the Gravitat website and your rights under data protection law.

## 1 Controller for the data processing

The controller is:

**Bank für Tirol und Vorarlberg Aktiengesellschaft**  
Stadtforum 1, 6020 Innsbruck

T +43 505 333 – 0

E [info@btv.at](mailto:info@btv.at)

'BTV', 'we', or 'us').

**Contact info for the data protection officer:**

E [datenschutz@btv.at](mailto:datenschutz@btv.at)  
by post via the BTV

## 2 We process the following data

### 2.1 Email us

If you send us an inquiry, we collect your name, email address, telephone number, message, etc. We use those data exclusively to answer the inquiries we receive.

### 2.2 Anonymised usage data

Anonymised IP addresses, country, device type, page views via URLs, PDF downloads made, video views, length of visits, pages per visit, traffic from search engines, campaigns, anonymised number of Gravitat websites visited, social networks, direct accesses, clicks on 'contact by email', clicks on 'contact by phone'.

We process these usage data in Matomo Analytics for statistical purposes, to improve our services, and to detect and prohibit abuse. We have activated cookieless tracking. All data are anonymised, and we cannot draw any conclusions about individuals.

Your IP address will be processed in anonymised form. The collected usage data contain no personal data. The collected data will be used only to analyze website use and for no other purpose. The data will not be shared with third parties or combined with data from other websites.

## 3 Categories of recipients

Furthermore, service providers we commission (processors in accordance with Art. 28 GDPR) and vicarious agents will receive your data if they need them to render the respective service. These are companies who do business in the IT and cloud services sector. If your inquiry necessitates it, access to your data will also be given to other offices and people who need them to answer your inquiry (such as the BTV's legal department and service providers in the hotel and gastronomy (catering) sectors).

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All processors and partners must be contractually obligated to protect bank secrecy and not disclose any facts they learn about, and must handle your data confidentially.

## 4 Transmissions into third countries

Data will not be transferred to agencies in countries outside the European Union (known as 'third countries').

## 5 Retention period

The data associated with your inquiry will be erased after one year.

## 6 Obligation to provide your data

When you establish contact by email, you must provide the personal data that are needed to answer your inquiry (including but not limited to your email, name, and telephone number). Without those data, we will normally be unable to answer your inquiry.

## 7 No automated decision-making in an individual case

Pursuant to Article 22 of the GDPR, we do not use fully automated decision-making or profiling.

## 8 Profiling

No profiling will occur.

## 9 Data security

We take protecting your personal data very seriously and use technical and organizational security measures to protect the data of which we become aware against accidental or intentional manipulation, loss, and destruction, and against access by unauthorized individuals. It is also a matter of course for us to guarantee that our data centers meet all the security standards under ISO/IEC 27001. We also impose our security standards on the service providers we use, whom we have obligated to comply with identical or comparable safeguards. Our security measures are continuously revised in accordance with technological developments.

## 10 Your rights as a data subject

You have the rights to information (Art. 15 GDPR), rectification (Art. 16 GDPR), erasure (Art. 17 GDPR), restriction of processing (Art. 18 GDPR), and data portability (Art. 20 GDPR), and the right to object to the data processing (Art. 21 GDPR).

If you have given us your consent to the processing of personal data, you can withdraw that consent at any time. This also applies to declarations of consent that you gave us before the General Data Protection Regulation took effect. Please note that the withdrawal is only effective for the future. Processing that took place before the withdrawal is not affected.

If you believe the processing of your personal data does not meet the requirements under data privacy law, please contact us to clear up your concerns.

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You may also express your concerns about the processing of your data to a supervisory authority (Art. 77 GDPR); for example, to:

Austrian Data Protection Authority  
Barichgasse 40-42  
1030 Vienna  
T +43 1 52 152 – 0  
E [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at)

## 11 Miscellaneous

As part of ongoing technical advancements, we will update the information on data privacy if needed. You can find the current Privacy Policy in the footer of the Gravitat website.