

Privacy Policy — OTRO Elements

(Version 1.0 — 2025)

OTRO Elements, operated by Otro Elements Società Agricola (Via al Parco 4, 21026 Gavirate (VA), Italy), is committed to protecting your personal data and processing it in accordance with the General Data Protection Regulation (GDPR) and applicable privacy laws.

This Privacy Policy explains which personal data we collect, how we use it, and what rights you have.

If you have any questions, please contact: info@otroelements.com.

1. Data Controller

Otro Elements Società Agricola

Via al Parco 4

21026 Gavirate (VA), Italy

E-mail: info@otroelements.com

2. Personal Data We Collect

We process the following categories of personal data, depending on how you interact with us:

A. When you contact us (email or contact form):

- Name
- Email address
- Phone number (if provided)
- Content of your message

B. When you register for an expedition:

- Name, address, country of residence
- Email address and phone number
- Emergency contact details (ICE)
- Passport/ID information (if needed for logistics or local tourist registration)
- Health-related information voluntarily provided for safety purposes
- Dietary preferences or restrictions
- Payment information (via invoice)

C. When you sign up for the newsletter:

- Name
- Email address
- Consent timestamp

D. When you visit our website:

We only use essential technical cookies; we do not track users for advertising purposes.

E. Photo and video material:

- Photos or videos taken during expeditions or events
- Only a limited amount of photo or video material is made during our expeditions, but participants should be aware that it may occur (see section 5)

3. Legal Basis for Processing

We process personal data based on the following legal grounds:

Contractual necessity

For expedition registration and participation.

Legitimate interest

To communicate with you after you contact us voluntarily.

Consent

For:

- Newsletter subscriptions
- Use of photo/video material where required
- Sensitive data such as health information

Legal obligation

For accounting and invoicing purposes.

4. How We Use Personal Data

A. To organize and run expeditions

- Registration and administration
- Safety management and emergency procedures
- Sharing necessary information with facilitators, guides, and mountain partners
- Communication before, during, and after the expedition

B. To respond to your inquiries

When you contact us directly.

C. To send newsletters

Only when you give explicit consent (opt-in).

Every newsletter includes a simple unsubscribe option.

D. For accounting and administration

In accordance with Italian and EU law.

E. For photos and videos

See next section.

5. Use of Photos & Videos

During expeditions, photos or videos may occasionally be taken for:

- internal documentation
- sharing memories with participants
- website or social media content
- promotional materials related to OTRO Elements

We respect your privacy:

Participants are informed before and during the expedition

You may object at any time

- If you do not wish to appear in photos or videos, inform us verbally or in writing
- We will respect your choice and exclude/remove images accordingly

We do not publish images in a way that identifies individuals without a clear purpose or without respecting objections.

6. Newsletter Communication

You will only receive newsletters if:

- you explicitly subscribe via our website,
- or you check the newsletter opt-in on the expedition registration form,
- or you check the newsletter opt-in on the contact form.

We do not add people automatically to the newsletter list.

Unsubscribing is possible at any moment via the link in every email.

7. Sharing of Personal Data

We only share your data with:

- Expedition facilitators or guides (only what is necessary)
- Logistics partners (e.g., accommodation, transport providers)
- Local tourist registration
- Accounting systems and legal authorities when required

We do not sell or rent personal data to third parties.

8. Storage Duration

We retain data only as long as necessary:

- Expedition administration: 5 years
- Accounting data: 10 years (legal requirement)
- Newsletter data: until you unsubscribe
- Contact form messages: 12 months
- Photo/video material: until we no longer use it, unless you request removal

9. Security Measures

We take appropriate technical and organizational measures to protect your data from:

- unauthorized access
- loss
- misuse
- alteration

10. Your Rights Under GDPR

You have the right to:

- access your data
- correct inaccurate data
- request deletion (“right to be forgotten”)
- withdraw consent at any time
- restrict processing
- object to processing
- request a copy of your data (data portability)

Send requests to: info@otroelements.com

We respond within 30 days.

11. Complaints

If you have concerns about your privacy, please contact us first.

You also have the right to file a complaint with your national Data Protection Authority.

12. Changes to This Policy

We may update this Privacy Policy when necessary.

The latest version will always be available on our website.