

PRIVACY NOTICE

(Pursuant to Article 13 of Regulation (EU) 2016/679 – GDPR)

Duomo Viaggi e Turismo S.p.A., with its registered office in Milan, Via Sant'Antonio 5, Tax Code and VAT No. 01198340158, in its capacity as Data Controller ("Controller"), hereby informs you, pursuant to Regulation (EU) 2016/679 ("GDPR"), that your Personal Data will be processed in accordance with the following methods and for the purposes described below.

1. SUBJECT MATTER OF THE PROCESSING

The Controller processes your personal data (including, by way of example, your first name, surname, date and place of birth, address, telephone number, e-mail address and identity documents, hereinafter referred to as "Personal Data" or "Data") that you provide when entering into contracts for the Controller's products and services or when requesting pre-contractual or commercial information regarding products and services offered by the Controller or by third parties.

The Controller may also process special categories of personal data, as defined under Article 9 of the GDPR, including, by way of example, health-related information, solely where such data are necessary for the provision of the requested services (for example, information relating to food allergies, intolerances or disabilities that must be taken into account when arranging accommodation and/or transportation services).

2. PURPOSES OF THE PROCESSING

Your Personal Data shall be processed in accordance with the principles of lawfulness, fairness, transparency, data minimisation and confidentiality, as set out in Regulation (EU) 2016/679 (GDPR), any applicable national legislation and the guidelines issued by the Italian Data Protection Authority. Your Personal Data will be processed for the following purposes:

A) Processing without your explicit consent (Article 6(1)(b) and (e) GDPR) Your Personal Data will be processed for the following service-related purposes: a) responding to your requests regarding the products and services offered by the Controller; b) entering into contracts for travel, accommodation and the supply of products and services provided by the Controller; c) fulfilling pre-contractual, contractual, accounting and tax obligations arising from the contractual relationship; d) complying with obligations imposed by applicable laws, regulations, European Union legislation or orders issued by competent authorities; e) applying, on your behalf, for visas, permits or other travel authorisations necessary for the provision of the requested services (for example, travel to countries requiring entry visas); f) carrying out any other activity necessary for the provision of the requested travel services and ensuring that such services comply with all applicable legal and regulatory requirements, while safeguarding the safety, health and wellbeing of the Data Subject and any persons travelling with them.

For the above purposes, the Personal Data processed may include, by way of example but not limitation:

- personal identification data (first name, surname, place and date of birth, residential address) relating to you, your family members or any individuals on whose behalf you organise the trip, stay, travel experience or activity (hereinafter referred to as the "Trip");
- identity document details required for reservations, visa applications, permits and other travel formalities;
- contact details (e-mail address, telephone number and mobile number);
- credit card details or other payment information required for payment of services provided by the Controller or for bookings and payments made directly to third-party suppliers (hotels, resorts, tourist attractions, theme parks and similar providers).

B) Processing based on your specific consent (Article 7 GDPR) Subject to your explicit consent, your Personal Data may also be processed for marketing purposes, including: a) sending newsletters, commercial communications and promotional material relating to products and services offered by the Controller via e-mail, postal mail, SMS and telephone; b) conducting customer satisfaction surveys regarding the quality of the services provided; c) sending commercial and promotional communications relating to products and services offered by third parties, including the Controller's business partners.

C) Processing of special categories of personal data. Subject to your explicit consent, the Controller may process special categories of personal data pursuant to Article 9 GDPR, including information relating to health conditions, vaccinations, allergies, food intolerances, dietary requirements and food preferences, exclusively where such information is required by national or international legislation or is necessary to ensure your safety, health and comfort throughout the Trip.

3. LEGAL BASIS FOR THE PROCESSING

The processing of your Personal Data is based on one or more of the following legal grounds:

1. Performance of a contract. The processing is necessary for the performance of a contract to which the Data Subject is a party (for example, the execution of travel contracts) or in order to take steps at the request of the Data Subject prior to entering into a contract (for example, providing quotations or requested travel proposals), pursuant to Article 6(1)(b) GDPR.
2. Compliance with legal obligations. The processing is necessary for compliance with legal obligations to which the Controller is subject, including accounting, tax and customs obligations, invoicing and any other legal requirements, pursuant to Article 6(1)(c) GDPR.
3. Protection of vital interests. The processing is necessary to protect the vital interests of the Data Subject, particularly with regard to health and personal safety. Accordingly, information relating to health conditions, vaccinations, allergies, food intolerances, dietary requirements and food preferences may be processed not only for contractual or legal purposes but also in order to protect the vital interests of the Data Subject.
4. Legitimate interests of the Controller. The processing is necessary for the purposes of the legitimate interests pursued by the Controller. For example, where the Data Subject voluntarily contacts the Controller through the website or by other means requesting information, the Controller has a legitimate interest in maintaining such contact and providing information relating to its products and services, including direct marketing communications.
5. Consent of the Data Subject. The processing is based on the explicit consent given by the Data Subject, particularly for marketing purposes.

In the cases referred to under points 4 and 5 above, the Data Subject may object to the processing at any time by sending an e-mail to: rpd@duomoviaggi.it

Processing activities include the collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment, combination, restriction, erasure and destruction of Personal Data. Personal Data may be processed both in paper form and by electronic and automated means. The Controller does not carry out automated decision-making processes, including profiling, and your Personal Data will never be publicly disclosed.

4. ACCESS TO PERSONAL DATA

For the purposes set out in Article 2 of this Privacy Notice, your Personal Data may be accessed by the Controller's employees and collaborators who have been duly authorised to process personal data in the performance of their duties, including, where applicable, the Controller's system administrators.

5. DISCLOSURE OF PERSONAL DATA

For the purposes referred to in Article 2(A), the Controller may disclose your Personal Data (and, where strictly necessary, your Special Categories of Personal Data) to the following categories of recipients:

- Companies belonging to the same corporate group as the Controller, where they provide, or may provide, services necessary for the performance of contractual obligations as Data Processors on behalf of the Controller.
- Third-party suppliers to whom the Controller is required to communicate your Personal Data in order to perform the services requested by you, including, by way of example: hotels, bed & breakfasts, resorts, tourist villages, hotel chains and other accommodation providers for the reservation of rooms included in travel packages; airlines, railway companies, ferry operators and other transport providers for the organisation of your travel arrangements; restaurants, museums, art galleries, monuments, tourist attractions and other service providers included in your itinerary.
- Italian and foreign public authorities and public bodies to which the Controller is required, or may be required, to disclose your Personal Data for the organisation of your Trip, including, by way of example: embassies and consulates; customs authorities; airport authorities; public health authorities; public security authorities.
- Italian and foreign public authorities where disclosure is required for tax, customs, administrative or regulatory purposes.

- Suppliers appointed by the Controller for services connected with the organisation and management of your Trip, including: logistics providers; payment service providers; banks and financial institutions; insurance companies and insurance brokers; customer assistance providers; accounting and tax consultants; legal advisers.
- Mailing list management providers and suppliers of newsletter and direct marketing services, where you have requested to receive newsletters or commercial communications.
- Any other recipients to whom the disclosure of your Personal Data is necessary in order to perform the contract concluded with you, comply with legal obligations or fulfil requests made by competent authorities.

Important Notice

Where travel is organised to countries outside the European Union for which the European Commission has not adopted an adequacy decision pursuant to Article 45 GDPR and where appropriate safeguards pursuant to Article 46 GDPR are not available, travellers may not be able to exercise the rights granted under the GDPR either against the Controller, against any local data controllers, or directly against third parties such as accommodation providers, local carriers, healthcare facilities or other local service providers. This is because the legislation of the destination country may not provide data protection standards equivalent to those established under European Union law.

The traveller acknowledges that the communication of Personal Data to such recipients is essential for the organisation and performance of the requested travel services and expressly agrees to such disclosure, notwithstanding the possible limitation of the rights provided for under the GDPR.

6. DATA RETENTION PERIOD

Your Personal Data will be processed and retained only for the period necessary to fulfil the purposes for which they were collected and, in any event, for no longer than ten (10) years following the termination of the contractual relationship, unless a longer retention period is required by applicable law.

Personal Data processed for marketing purposes and customer satisfaction surveys will be retained for a maximum period of two (2) years from the date on which your consent is given, unless such consent is withdrawn earlier.

Special Categories of Personal Data, including health-related information, will be processed only for the period strictly necessary to provide the services referred to in Article 2(C) of this Privacy Notice and in compliance with applicable legal obligations.

7. NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF FAILURE TO PROVIDE THEM

The provision of your Personal Data and, where required, your Special Categories of Personal Data for the Service Purposes referred to in Article 2(A) is mandatory. Failure to provide such data will prevent the Controller from providing the requested services. The provision of Personal Data for the purposes referred to in Article 2(B) (Marketing Purposes) is optional. You are therefore free not to provide such data or to withdraw your consent at any time after it has been given.

Should you decide not to provide your Personal Data or subsequently withdraw your consent, you will no longer receive newsletters, commercial communications or promotional material relating to products and services offered by the Controller or, where applicable, by its business partners. Withdrawal of consent shall not affect the lawfulness of processing carried out prior to such withdrawal. In any event, you will continue to receive the services referred to in Article 2(A).

8. DATA SUBJECT RIGHTS

As a Data Subject, you are entitled to exercise the rights granted under Articles 15 to 22 of the GDPR. In particular, you have the right to:

A. Right of Access. Obtain confirmation as to whether or not your Personal Data are being processed and, where that is the case, access to such data together with the following information: the purposes of the processing; the categories of Personal Data concerned; the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, particularly where recipients are located in third countries or are international organisations; where possible, the period for which the Personal Data will be stored or, if this is not possible, the criteria used to determine that period;

your right to lodge a complaint with the competent Supervisory Authority; where the Personal Data have not been collected directly from you, any available information as to their source; the existence of automated decision-making, including profiling, and meaningful information about the logic involved and the significance and envisaged consequences of such processing.

B. Right to Rectification. Request the correction of inaccurate Personal Data and the completion of incomplete Personal Data.

C. Right to Erasure ("Right to be Forgotten") Request the erasure of your Personal Data where: the Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed; you withdraw your consent and there is no other legal basis for processing; you object to the processing and there are no overriding legitimate grounds for continuing the processing; the Personal Data have been unlawfully processed; the Personal Data must be erased in order to comply with a legal obligation.

D. Right to Restriction of Processing. Request the restriction of processing where: you contest the accuracy of the Personal Data; the processing is unlawful but you oppose the erasure of the Personal Data; the Controller no longer requires the Personal Data for processing purposes, but they are required by you for the establishment, exercise or defence of legal claims; you have objected to processing pending verification as to whether the legitimate grounds of the Controller override your own.

E. Right to Data Portability Receive your Personal Data in a structured, commonly used and machine-readable format and transmit those data to another Data Controller without hindrance where technically feasible. Where technically possible, you may also request that the Controller transmit your Personal Data directly to another Data Controller designated by you.

F. Right to Object Object, at any time and in whole or in part, to the processing of your Personal Data for direct marketing purposes, including profiling related to such marketing. Such objection may concern: marketing communications sent by e-mail; SMS messages; telephone calls; postal mail; any other traditional or automated means of communication. You may choose to object to all marketing communications or only to specific communication channels.

9. HOW TO EXERCISE YOUR RIGHTS

You may exercise any of the rights described above by writing to the Controller at: Duomo Viaggi e Turismo S.p.A. Via Sant'Antonio 5, 20122 Milan -Italy or by sending an e-mail to: rpd@duomoviaggi.it The Controller will respond to your request within the time limits established by the GDPR.

10. DATA CONTROLLER, DATA PROCESSORS AND DATA PROTECTION OFFICER

The Data Controller is: Duomo Viaggi e Turismo S.p.A. Via Sant'Antonio 5, 20122 Mila – Italy. An up-to-date list of the Data Processors appointed by the Controller is available at the Controller's registered office and may be requested at any time. The Controller has appointed a Data Protection Officer (DPO), who may be contacted at: Duomo Viaggi e Turismo S.p.A. Via Sant'Antonio 5 - 20122 Milan Italy E-mail: rpd@duomoviaggi.it

ACKNOWLEDGEMENT

I hereby acknowledge that I have received and read the Privacy Notice of Duomo Viaggi e Turismo S.p.A.

Place _____

Date _____

Signature _____

CONSENT

Processing of Special Categories of Personal Data

I GIVE MY CONSENT

I DO NOT GIVE MY CONSENT

to the processing of Special Categories of Personal Data (such as health data, including food allergies, intolerances or disabilities) for the purpose of organising transport, accommodation and other travel services.

Place _____

Date _____

Signature _____



Marketing Communications from Duomo Viaggi e Turismo S.p.A.

I GIVE MY CONSENT

I DO NOT GIVE MY CONSENT

to the processing of my Personal Data for marketing purposes, including the sending of newsletters, commercial communications and promotional material relating to products and services offered by Duomo Viaggi e Turismo S.p.A. by e-mail, post, SMS and telephone.

Place _____

Date _____

Signature _____

Marketing Communications from Third-Party Business Partners

I GIVE MY CONSENT

I DO NOT GIVE MY CONSENT

to the processing of my Personal Data for the purpose of receiving commercial and promotional communications from third-party business partners of Duomo Viaggi e Turismo S.p.A.

Place _____

Date _____

Signature _____

Customer Satisfaction Surveys

I GIVE MY CONSENT

I DO NOT GIVE MY CONSENT

to the processing of my Personal Data for the purpose of conducting customer satisfaction surveys relating to the quality of the services provided.

Place _____

Date _____

Signature _____