



FRIGERIO VIAGGI®

Privacy Statement relating to personal data processing

Pursuant to Article 13 of General European Regulation 679/2016 ("GDPR"), setting out provisions safeguarding data subject rights in relation to personal data processing, you shall communicate your personal data or third party data that you are lawfully in possession of to **FRIGERIO VIAGGI S.r.l.** (hereinafter "FV"), which provides you with the following information regarding personal data processing for the purpose of:

- Organising tourist packages;
- Assisting with the purchase of connected tourism services;
- Liaising as intermediaries in relation to third party tourism packages or individual services provided by a third party (e.g. hotels, cars, etc.);
- Liaising as intermediaries in relation to the purchase of financial/insurance services connected with special tourism packages/services or packages purchased separately (healthcare policies, luggage policies, cancellation policies, traveller assistance, consumer loans);
- Obtaining all necessary Visas;
- Registering on our website and/or app and completing the forms on our website and/or app.

Legal grounds and purpose of processing.

Pursuant to Articles 9 and 10 of the GDPR, you hereby acknowledge that as a result of negotiating and/or executing a contract, FV might be sent data that constitutes a "special category of personal data", meaning data that is data that is already known as sensitive, which reveals "racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation" or data revealing habits and/or preferences connected with travel needs or the use of tourist services.

a) Purposes relating to contractual services. Your

Your personal data shall be processed for the purpose of the fulfilment of the obligations deriving from the negotiation and the execution of the contract relating to package tourist services or in relation to the purchase of linked tourist services or the purchase of individual tourist services, or otherwise for the fulfilment of the obligations concerning the contractual relationship, including negotiations, so that FV is then able to render the agreed services properly. In particular, the data will be processed for the following activities:

- entering into, managing and performing the contractual relationships between you and FV, including the aforementioned intermediary services;
- Replying to your requests;
- Issuing communications relating to packages or tourist services or additional services (for example information on the services purchased, amendments to contractual terms and conditions, reimbursements, etc.)

b) Legislative purposes. Your data will be processed also for:

- Complying with obligations under law, regulations, national, European and international laws or if ordered by the competent Authorities;
- Accept, enforce and/or defend in litigation (including before the courts) a right of FV?
- Complying with all applicable tax and accounting obligations;
- Complying with all health and safety obligations for travellers;
- Complying with all obligations concerning the transportation of passengers and goods.

c) Business and statistical purposes. Your data shall also be processed for purposes relating to the business activities carried out by FV and for creating anonymous statistics and market research.

d) Other purposes. Furthermore, if you grant your express consent, your personal data shall also be processed for the following purposes:

Marketing, which includes:

1. FV promotional activities using automatic means (for example email, text messages, instant messaging, etc.) and manually (for example, ordinary post, telephone operator, etc.). In particular, FV may use your email address and other contact details that were provided when you supplied your data or when you purchased a tourist service package, to send you information and promotions relating to similar services and products as those offered by FV, provided that you do not object to that use.
2. Profiling, which means analysing your travel preferences and market research in order to improve the services we offer and the commercial information we provide so they are more aligned with your preferences. This activity may also be carried out/achieved using profiling cookies, which are used when you navigate on our websites and/or app.

e) Other purposes. Moreover, if you grant your express consent, your personal data shall be processed for the following purposes:

Marketing, which includes:

1. Promotional activities of FV's commercial partners using automatic means (for example email, text messages, instant messaging, etc.) and manually (for example, ordinary post, telephone operator, etc.). In particular, FV's commercial partners may use your email address and other contact details that were provided when you supplied your data or when you purchased a tourist service package, to send you information and promotions relating to similar services and products as those offered by FV, provided that you do not object to that use.
FV's commercial partners are part of the following sectors:
 - research;
 - air companies/navigation companies; rail companies; boat companies;
 - travel agents and network travel agents;
 - insurance companies.

Your personal data may be processed for marketing purposes (for promotional activities and for profiling) provided that you grant your consent.

Type of data provision and consequences in the case data is denied.

The provision of your data is optional however if you refuse to provide that data for the purposes specified under items a) and b) (to fulfil the contract and law obligations), it may not be possible to provide all or some of the requested services.

The provision of the optional data will make it possible for FV to improve the services on offer, making them more aligned with your personal interests and also with customer preferences.

The provision of sensitive/particular data is optional: however, if you withhold your consent, FV might not be able to comply with all legal obligations required for the provision of the contractual services.

Categories of personal data recipients.

Your data shall not be disseminated. Your data may be communicated –solely for the purposes set out above – to the following categories of recipients:

- Internal personnel from FV as data controller and/or processor;
- Suppliers of the tourist services included in packages or that provide linked services purchased via FV;
- Foreign countries where the transfer will occur on the basis of an adequacy decision by the European Commission pursuant to article 45 and/or adequate guarantees under Article 46 of EU Regulation 2016/679, namely: Andorra, Argentina, Australia, PNR, Canada, FaerOer, Guernsey, Isle di Man, Israel, Jersey, New Zealand, Switzerland and Uruguay.
- Suppliers and third parties, also in non-EU countries, for travel booking (hotels, airlines, sales offices, back office services, charter flights and distribution lines, assistance, admin);
- External processors and travel agents authorised to process data, who are regularly employed and trained on personal data processing;
- Insurance and finance companies that provide accessory and linked services with the tourist services and packages purchased;
- People, companies, associations and professional firms that provide services or assistance to FV, in order to safeguard a right (for example, accountants, lawyers, tax advisors, auditing companies, auditing advisors and due diligence experts, etc.);
- People, companies or agencies that providing marketing and market research services or advisory services to FV;
- Anyone entitled to access your data by law or secondary legislation or if authorised by a competent authority, including airport, port, customs and border authorities.

Transfer of personal data outside the European Union.

Your data may be transferred abroad to third party companies in EU or non-EU countries, for the purposes set out above.

In the event your data is transferred outside the European Union, FV shall double check the compliance with data processing rules and that the guarantees of an adequate level of physical protection are in place, as assessed by the European Commission or alternatively, that the recipients are contractually obliged to safeguard data with a comparable level of protection as the GDPR.

Storage of personal data.

Personal data shall be stored for the period strictly necessary to achieve the set purposes for which the data was collected and subsequently processed. Personal data shall be stored for the entire term of the contact you executed and also afterwards:

- For the term set forth by applicable law;
- For the term set forth by secondary laws requiring data retention (for example for the purpose of tax returns);
- For the term necessary to safeguard the data subject rights in the event of disputes relating to the provision of the relevant services.

Personal data collected and processed for the purpose of profiling shall be stored for a maximum period of 10 (ten) years at the end of which they will be automatically deleted or anonymized permanently.

Data Controller and Data Processor

The Data Controller is FRIGERIO VIAGGI S.r.l., with registered offices in Giussano (MB) Via Ambrogio Viganò 5, represented by the Chairman of the Board of Directors and the pro tempore legal representative Giancarlo Frigerio.

For the purpose of the processing of travellers' data, FV has appointed a Data Processor, who may be contacted in the event travellers wish to exercise their rights under data processing law, at:

e-mail: dpo@frigerioviaggi.com

Mail: Via A. Viganò, 5 20833 Giussano (MB)

Data Subject Rights.

Pursuant to Articles 15 to 22 of the GDPR, at any time – also in relation to profiling – you are entitled to:

- Request the Controller for access to your personal data and related information; the rectification of incorrect data or the integration of incomplete data; the deletion of personal data (in the event of the occurrence of the conditions contemplated in article 17(1) of GDPR and in accordance with section 3 of said article); the restriction of the processing of your personal data (in the occurrence of the situation contemplated in article 18(1) of GDPR);
- Request and obtain from the Controller – in the event the legal basis for processing is a contract or consent and was executed using automatic means – your personal data in a structured and legible format from an automatic device, also for the purpose of communicating said data to another data processing controller (right to portability of data);
- Object at any time to the processing of your personal data with respect to specific situations concerning you;
- Revoke your consent at any time if processing had been carried out with your consent for one or more purposes regarding common personal data (place and date of birth for example, or place of residency) or particular categories of data (for example, that reveal your race, political opinion, religious beliefs, health condition and sexual life). Processing based on consent that was carried out prior to the withdrawal of the consent is lawful;
- Lodge a complaint with the Data Protection Authority – www.garanteprivacy.it).

Frigerio Viaggi S.r.l.

Legal Representative
Giancarlo Frigerio



Giussano, 27 September 2018

