

Statement of information on processing personal data

Pursuant to article 13 of the General European Regulation n° 679/2016 (hereinafter GDPR), containing provisions for the protection of persons and other parties regarding the processing of personal data,

You provide your personal data or third-party personal data in your lawful possession to **FRIGERIO VIAGGI S.r.l.** (hereinafter "FV") which provides you with the following information regarding the purpose of processing personal data:

- for proposing, organising and providing services to support business trips requiring the provision of personal data to airlines, car hire companies, hotels, insurance companies, tour operators and other third-party operators providing services or performing activities in accordance with their contractual relations with Frigerio Viaggi.
- for the acquisition of personal information with the drafting of suitable technical and administrative procedures, including data pertaining to payment systems (for example pertaining to credit or debit cards) to be used between interacting systems in an encrypted manner with the protection of firewalls and security systems to prevent access by unauthorised persons to such data.
- for the organisation of a tourism package or for the provision of individual tourism services::
- for the purchase of related tourism services on favourable terms;
- for intermediation in the purchase of a tourism package organised by others or the purchase of single tourism services provided by third-party suppliers (for example hotels, carriers and so forth);
- for intermediation in the purchase of financial/ancillary insurance services and services relating to the tourism packages/services on favourable terms or purchased individually (health/luggage insurance policies; cancellation, assistance for travellers in difficulty, consumer credit);
- to perform tasks relating to the issuance of visas;
- for registration on our website and/or app or for filling in the forms present on the website or in the app.

Purpose and legal basis of data-processing

Pursuant to articles 9 and 10 of the GDPR, you acknowledge that as a result of negotiating and/or entering into and/or performing the agreement data may be sent to FV which relates to the definition of "special categories of personal data," in other words data which was previously referred to as sensitive data which reveals "a person's ethnic and racial origin, political opinions, religious or philosophical convictions or trade union membership in addition to genetic data, biometric data designed to uniquely identify a natural person or data relating to health or sex life or sexual orientation" or data relating to your habits and/or practices and customs connected to travel requirements or to use of the tourism service.

a) Purpose relating to contractual performance. Your personal data shall be processed in order to comply with obligations connected to the negotiation and stipulation of the agreements required for provision of the services, or for the performance of obligations arising from all the contractual relations, including during the negotiation stage, as referred to above, in order to allow FV to successfully provide the service. More specifically, data shall be processed for the following activities:

- to enter into, manage and perform contractual relations, including the aforementioned intermediation;
- to meet requests made by data subjects;
- communication of notices relating to the services purchased or other additional, ancillary services (for example statement of information relating to services purchased; modification to contractual conditions; cancellations, reimbursement and so forth).

b) Legal purpose. Your personal data shall also be processed to:

- ensure compliance with legal obligations, regulations, national, European Union and International legislation or obligations arising from orders given by authorities authorised to do so in accordance with law;
- establish, exercise and/or defend during any dispute, including in court, one of FV's rights;
- comply with obligations relating to fiscal and accounts matters;
- comply with obligations relating to laws governing traveller safety and health;
- comply with obligations relating to laws governing transport of passengers and goods.

c) Purposes relating to business and statistics. Your personal data shall also be processed for purposes relating to or pertinent to the business activity performed by FV and in order to anonymously process statistics and market research.

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

Marketing purposes which include:

1. *FV's promotional activities* carried out both in an automated manner (for example email, SMS, applications for instant messaging etc) and in a non-automated manner (for example ordinary mail, telephone calls with operators etc). More specifically FV may use your email address or another contact provided when you provide data or when purchasing tourism packages or services, in order to send informational and promotional communications to you relating to the analogous services and products offered by FV, provided that you do not object to use of same.
2. *Profiling*, in other words analysis of your travel and market research preferences in order to improve the offer of services and the business information presented by FV or otherwise to ensure that they conform to your interests. This activity may also be performed through providing satisfaction questionnaires and/or through the use of profiling cookies used whilst browsing on our sites and apps.

d) Additional purposes. Furthermore, should you give your express consent, your personal data shall be processed for the following purposes:

Marketing Purposes which include:

1. *FV's business partners' promotional activities* carried out both in an automated manner (for example email, SMS, applications for instant messaging etc) and in a non-automated manner (for example ordinary mail, telephone calls with operators etc). More specifically FV's business partners may use your email address or another contact provided when you provide data or when purchasing tourism packages or services, in order to send informational and promotional communications to you relating to the analogous services and products offered by the latter including without your consent, provided that you do not object to use of same.

FV's business partners belong to the following product class categories:

- hospitality;
- airline companies/maritime companies: railway carriers; road carriers;
- travel agents and networks of travel agents;
- insurance;

FRIGERIO VIAGGI S.R.L. - Registered Office via Viganò 5 20833 GIUSSANO (MB) - VAT N. 00851420968 TAX ID NUMBER: 07215280152 Share Capital € 1.250.000,00 i.v.

Register of Economic and Administrative information (REA) MB 1150618 - IATA code: 3826544 FS code: 123600 Third Party Liability Insurance N. 25420047-

RC15 - ID Number "Fondo Vacanze Felici" 489

A company with a management system which has been certified by IMQ Spa for the offices and activities cited by certificates: 9191.FGRV, 9192.FGR2, 9175.FGR3



Processing carried out for marketing purposes (in other words either for promotional or profiling activities) may be carried out subject to the condition that you have granted your consent.

The type of data collected and the consequences of any refusal.

The provision of your personal data is optional; nevertheless, should you fail to provide the data requested for purposes indicated in points a) and b) (purposes relating to contractual and legal performance) it will not be possible to provide the service requested or part thereof.

The provision of optional data shall allow FV to improve the services offered in order to ensure that they increasingly match its clients' personal interests.

The provision of sensitive/special personal data is voluntary; nevertheless if such consent is not granted to data processing, FV may be unable to comply with certain legal obligations relating to the performance of contractual services.

Categories of recipients of personal data.

Your data shall not be disseminated. Your data may be forwarded solely for the above-mentioned purposes to the following categories of individuals or legal entities:

- FV's in-house personnel in their capacity as data processing agent and/or data processor.
- Providers of the tourism services included in the packages which have been sold which provide related services or single services purchased from FV.
- Foreign countries for which an adequacy decision has been taken by the European Commission pursuant to article 45 and/or adequate guarantees pursuant to article 46 EU 2016/679, which are specifically: Andorra, Argentina, Australia, PNR, Canada, Faroe Islands, Guernsey, Isle of Man, Israel, Jersey, New Zealand, Switzerland and Uruguay.
- Providers and third parties, including in non-European Union countries, in order to carry out travel booking (hotels, airline companies, sales operation areas, back office, negotiating with charter flights and distribution lines, assistance and administration).
- External processors and third parties authorised to process data and authorised to handle travel files have been correctly engaged and trained on the processing of personal data.
- Insurance and financial companies providing coverage and ancillary services which are connected to the tourism packages and services purchased;
- Persons, companies, associations professional firms providing services or assistance and consultancy services to FV, in order to protect any of its rights (for example, certified public accountants, lawyers, tax consultants, auditors, consultants on auditing or due diligence operations etc).
- Persons, companies or agencies providing marketing and analysis services or consultancy services to FV;
- All those whose entitlement to access your data has been acknowledged by legal provisions and secondary laws or by instructions given by Authorities which are entitled to do so by law, including airport, port, customs and border authorities.

Transfer of personal data outside the European Union.

Your personal data may be transferred abroad to other companies which may or may not be in European Union member states, provided that it is for the aforementioned purposes.

Should your data be transferred to countries which are outside the European Union, FV shall first assess whether the rules applicable to the processing of data have been complied with and whether there are guarantees allowing for a suitable level of protection of individuals, on the basis of the assessments carried out by the European Union Commission or, alternatively, FV shall ensure that the recipient is under a contractual obligation to protect data with a protection level which is suitable and comparable to the level required under the GDPR.

Retention of personal data.

The personal data shall be retained for no longer than is necessary for achieving the reasons for which it is collected and subsequently processed. Personal data shall be retained throughout the currency of the agreement entered into by you and also for a subsequent period:

- within the terms laid down by applicable law;
- within the terms laid down by law including secondary law imposing the retention of data (for example tax declarations);
- within the period required for protecting data controller's rights in the event of any disputes relating to provision of the services.

Personal data collected and processed for purposes of profiling shall be retained for no more than ten (10) years, at the end of which it shall be automatically erased or permanently anonymized.

Data Controller and Data Protection Officer

The data controller is FRIGERIO VIAGGI S.r.l., whose registered office is in Giussano (MB) Via Ambrogio Viganò n° 5, represented by the Chairman of the Board of Directors and the legal representative, Mr Giancarlo Frigerio.

With regard to processing travellers' data, FV has designated a Data Protection Officer whose contact data, in order to allow travellers to exercise their rights arising under the provision of law governing the processing of personal data, is as follows:

mail: dpo@frigerioviaggi.com

Ordinary mail address: Via A. Viganò, 5 20833 Giussano (MB)

Data subject's rights.

At any time, pursuant to articles 15 and 22 of the GDPR you are entitled, also with regard to profiling, to:

- ask the data controller for access to your personal data and to information relating to same; the correction of imprecise data or completion of incomplete data; erasure of personal data pertaining to you (upon occurrence of one of the conditions indicated in article 17, paragraph 1 of the GDPR and in accordance with the exceptions provided for in paragraph 3 of such article); limitation on the processing of your personal data (upon occurrence of one of the situations indicated in article 18, paragraph 1, of the GDPR);
- ask and obtain from the data controller – should the legal basis of processing be the agreement or consent, and should this be made using automated means - your personal data in a structured machine-readable format, also for purposes of forwarding your data to another data controller (being known as the right to data portability);
- raise objection at any time to the processing of your personal data should particular situations regarding you occur;
- withdraw consent at any time, solely with regard to the eventuality that processing is based on your consent to one or more specific purposes and concerns common personal data (for example date and place of birth or place of residence) or otherwise particular categories of data (for example data showing your racial origin, political opinions, religious convictions, or sex life). Processing based on consent which is granted prior to withdrawing such consent nevertheless remains lawful;
- file complaints with a supervisory authority (Data Protection Authority – www.garanteprivacy.it).

Frigerio Viaggi S.r.l.

The Legal Representative
Dott. Giancarlo Frigerio



Giussano, December 19, 2018

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