

INFORMATION ON THE PROCESSING OF PERSONAL DATA AND ACQUISITION OF CONSENT

Onda Verde Viaggi of Valsana Servizi SC (hereinafter also “ADV”), as Data Controller of the processing, according with the art. 13 of the General European Regulation about the Safeguard of Personal Data 679/2016 (hereinafter also “GDPR”), provides the following information about the processing of personal data that you, as interested party, has communicated to us:

- a. for the organization of a package tour;
- b. to facilitate the purchase of related travel services;
- c. for intermediation in the purchase of a package tour organized by third party or of individual travel services provided by other suppliers (i.e. hoteliers, carriers);
- d. for the intermediation on the purchase of extra financial/insurance services connected to the package tour or travel services individually facilitated or purchased (medical and luggage policies; cancellation; assistance to the traveler in a case of emergency; consumer credit);
- e. to fulfill the task of the issuing visas;
- f. to register on our website and/or the app or to fill out the present form on the website or on the app.

Purpose and legal basis of the processing

Moreover, among the data provided by you, there could also be some personal data defined by the GDPR and by the Italian harmonization legislation as “particular” (i.e. health, judicial). The sensible/particular data will be processed on the basis of the purposes listed below and only with your express approval.

a) Purpose related to contractual service

Your personal data will be processed with the aim to fulfill the obligations arising from the negotiation and from the contract relating to the organization of package tour or with the aim to support the purchase of related travel services or to intermediate for the purchase of individual travel services or for the perform of the obligation arising from all the contractual rapports, included the negotiation phase, listed above from the letter a) to f), in order to allow to ADV to provide optimal performance, in particular for:

- i. the conclusion, management and execution of contractual rapports between you and the ADV;
- ii. answer your request;
- iii. the communication of advertising, related to the purchased package tour or to travel services or extra services (i.e. information related to the purchased travel services; modification of contractual conditions; cancellation);

b) Law purpose

Your personal data will also be processing to:

- i. execute law obligations, regulations, national, European and international legislation or other legislation derived from provisions given by authorities legitimate by the law;
- ii. verify, perform and/or safeguard in judicial proceeding a right of ADV;
- iii. comply with obligations expected in fiscal or accounting field;
- iv. comply with obligations related to the legislation on the safety and health of travelers;
- v. comply with obligations related to the regulations of passenger and freight transport.

c) Purpose related to business and statistics

Your personal data will be processed for purposes relevant for the activity carried out by the ADV and for the elaboration in anonymously form of the statistics and market researches.

d) Other purposes

Moreover, if you expressly agree, your personal data will be processed for the following purposes:

Marketing Purpose, which includes:

a. promotional activities of the ADV and/or commercial partners, realized both with automated methods (i.e. email, text messages, instant messages apps, etc) and with no-automated methods (i.e. ordinary post, phone with operator, etc). In particular, the ADV may use your email address, provided at the moment of the purchase of package tour or travel services, to transmit you newsletters related to services and similar products offered by ADV and/or business partner, even without your approval, as long as you do not oppose such use. The business partner belong to the following product categories:

a1. accommodation facilities;

b1. airlines and shipping companies, railway carriers, vectors on rubber;

c1. travel agencies and travel agencies networks;

d1. insurance companies;

b. profiling activities, that means activities of analysis of your travel preferences and market researches in order to improve the offer of services and commercial information presented by us, making them more compliant with your interests. This activity may also be made through the administration of satisfaction questionnaires and/or use of profiling cookies used during the navigation on our websites and apps. The processing for marketing purposes (both for promotional and for profiling activities) may only be made with your approval.

Nature of the provision of data and consequences of any refusal

The provision of your personal data is optional but in the absence of the requested data for the purposes indicated in the letters a) and b) (related to the contractual and legal performance) the requested service or part of it can not be performed and you will not be able to take advantage from the opportunities mentioned above. The provision of optional data gives the possibility to ADV to improve the offered services with the purpose to respond to the personal interest of the costumers. The provision of sensible/particular personal data is voluntary; however, the absence of the agreement means that the ADV may not be able to comply with the contractual obligation related to the processing of such data.

Categories of recipients of personal data

Your data will not be disseminated. Your data may be communicated, exclusively for the purposes mentioned above, to the following categories of subjects:

- internal staff of the ADV as person in charge and/or responsible of the processing;
- to the supplier of travel services included in the packages sold or who lend the connected or individual services purchased at the ADV;
- to insurance companies that provide extra coverage associated with the package tours and travel services purchased;
- individuals, companies, associations or professional firms that provide services or assistance and consultation activities in favor of ADV in order to safeguard their own rights (i.e. accountants, lawyers, fiscal consultants, auditors, consultants for auditing operation or due diligence, etc);
- individuals, companies, or agencies that provide marketing and analysis services or consulting activities in favor of ADV;
- entities whose right to access to your data is recognized by the legal provisions or secondary regulation or provision issued by authorities legitimated by the law, including airport, port, customs, and border control authorities.

Transfer of personal data outside the European Union

Your personal data may be transferred to foreign third party companies who belong or not to the European Union, for purposes indicated above. In case of data transfer to countries outside the

European Union, those countries guarantee an appropriate level of protection on the basis of a specific decision of the European Commission or, in alternative, the recipient will be contractually obliged to protect data with an adequate and comparable level of protection provided by GDPR.

Personal data storage

Personal data will be stored for a period not exceeding that necessary to achieve the purposes for which the data have been collected and processed. The personal data will be stored during all the period of contract signed by you and for a subsequent period:

- i. within the deadline determined by current legislation;
- ii. within deadline determined by a secondary legislation that imposes the retention of data (i.e. tax declarations);
- iii. within the period necessary to protect the rights of the data controller in the event of any disputes related to the provision of services;

The personal data collected and processed with profiling purposes will be stored for a period not exceeding ten (10) years, at the end of which they will be automatically canceled or permanently made anonymous.

Owner and Responsible of the processing

The Data Controller is Onda Verde Viaggi di Valsana Servizi SC, based in *Via Convento 1 Follina – Treviso – Italia* as its legal representative pro tempore.

Rights of the data subject

At any time, in accordance with the art. 15 to 22 of the GDPR you have the right, also in relation to the profiling activities, of: - request to the owner the access to your personal data and to the information related to them; correction of the inaccurate data or integration of incomplete data; cancellation of personal data connected to you (upon the occurrence of one of the conditions indicated in the art. 17 (1) of the GDPR and in compliance with the exceptions provided for the paragraph 3 of the same article); the limitation to the processing of your personal data (in the event of one of the hypothesis indicated in the art. 18 (1) of the GDPR); - request and obtain from the owner – in the cases in which the legal basis of the processing is the contract or the consent, and the same is undertaken out by automated means; - your personal data in a structured and machine-readable format, even with the purpose to communicate such data to other data controller (c.d. right to the portability of personal data); - oppose at any time to the processing of your personal data in the event of particular situations that affect you; - withdraw the consent at any time, only for the cases in which the processing is based on your consent for one or more purposes and that concerns common personal data (i.e. date and place of birth or place of residence), or particular categories of data (i.e. data revealing your racial origins, your political opinion, your religious beliefs, your state of health or your sexual life). The processing based on the consent and carried out prior to its withdrawal, preserves its lawfulness; - lodge a complaint with the supervisory authority (Autorità Garante per la protezione dei dati personali – www.garanteprivacy.it).

Provision of consent to data processing

A) Having read the above information, I consent to the processing, in accordance with the methods indicated, to my personal data with the purposes set out in the point a) and b) (purpose related to the contractual service and law purpose)

I agree I don't agree

B) Having read the above information, I consent to the processing, with the methods indicated, to my personal data with the purpose set out in the point c) (purposes related to business and statistics)

I agree I don't agree

C) Having read the above information, I consent the processing, with the methods indicated, of my personal data with the purpose set out in the point d) (marketing purpose)

I agree I don't agree

Place and date _____

Signature _____