

## Information on the processing of personal data and consent acquisition

**The Tour Operator Trentino holidays S.r.l.** (hereinafter also "ADV") **joint data controller with Azienda per il turismo della Val di Fassa Società Cooperativa, as data controller, pursuant to art. 13 of the European General Regulations on Protection of Personal Data 679/2016 (hereinafter the "GDPR")**, provides the following information about the processing of personal data that you, as an interested party, have communicated to us:

- A. for the organization of a tourist package;
- B. to facilitate the purchase of related tourist services;
- C. for intermediation in the purchase of a tourist package organized by third parties or individual tourist services provided by third-party suppliers (eg hoteliers, carriers);
- D. for intermediation in the purchase of ancillary financial services / insurance and linked to packages / tourist services facilitated or purchased individually (medical policies - baggage; annulment; assistance to the traveler in difficulty; consumer credit financing);
- E. to fulfill the task of issuing visas;
- F. to register on our website and / or the app or fill out the forms on the website or in the app;

### **Purpose and legal basis of the processing.**

In addition, 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" (e.g. health, judicial).

Sensitive data. The details will be processed according to the purposes indicated below and only with your express consent.

- A. **Purpose relating to contractual performance.** Your personal data will be processed for the fulfillment of the obligations arising from the negotiation and the contract related to the organization of the tourist package, or the mandate to facilitate the purchase of related tourist services or the brokerage mandate for the purchase of individual tourist services or in any case for the execution of obligations arising from all contractual relationships, including the phase of negotiations, indicated in the previous letters. A) to F), in order to enable the ADV to optimally deliver the performance in particular for:
  - a. the conclusion, management and execution of the contractual relationships between you and the ADV;
  - b. answer your requests;
  - c. the communication of notices, relating to the package or services purchased tourists or other additional services and accessories (eg information on the purchased tourist services; contractual conditions; cancellations);
- B. **Purpose of the law.** Your personal data will also be processed for:
  - a. the execute legal obligations, regulations, national, EU and international regulations or deriving from provisions issued by Authorities legitimated by the law;
  - b. ascertain, exercise and / or defend in litigation, including judicial, a right to ADV;
  - c. fulfill the obligations envisaged in the fiscal and accounting fields;
  - d. fulfill obligations related to the safety and health regulations of travelers;
  - e. fulfill obligations related to passenger and freight transport regulations.
- C. **Purposes related to business and statistics.** Your personal data will also be processed for purposes relevant or relevant to the activity carried out by the ADV and for the anonymous processing of statistics that is market research.
- D. **Additional purposes.** Furthermore, if you expressly consent to it, your personal data will be processed for the following purposes:

#### **Marketing purposes , which include:**

- a. promotional activities of the ADV, and / or commercial partners, realized both with automated methods (eg email, text messages, applications for instant messaging, etc.) and with non-automated methods (eg postal mail, telephone with operator, etc.). In particular, the ADV will be able to use your email address, provided at the time of purchase tourist packages or services, to transmit informative and promotional communications related to the services and similar products offered by the ADV and / or by commercial partners without your consent, provided you do not object to such use.

The business partners belong to the following product categories:

- a. accommodation activities;
- b. airlines / shipping companies; railway carriers; vectors on rubber;
- c. travel agencies and travel agency networks;
- d. insurance;
- e. communications relating to the activities referred to in the signed contract;
- f. insertion in the common database with the co-owners of the Azienda per il turismo della Val di Fassa Società Cooperativa Treatment for the purpose of sending newsletters, commercial and institutional communications;
- b. profiling activities, i.e. analysis of your travel preferences and market research in order to improve the services offered and the commercial information presented by us, making them more compliant with your interests. This activity can also take place through the administration of satisfaction questionnaires and / or the use of profiling cookies used while browsing our sites and apps.

The treatment for marketing purposes (therefore both for promotional and profiling activities) can only take place with your consent.

### **Nature of the provision of data and consequences of any refusal.**

The provision of your personal data is optional, however, in the absence of the data required for the purposes indicated in points a) and b) (purposes related to the provision of contracts and by law)

the performance no request or part of it cannot be executed and you will not be able to take advantage of the opportunities mentioned above.

The provision of optional data will allow ADV to improve the services offered in order to make them more and more responsive to the personal interests of its customers.

The provision of sensitive / particular personal data is voluntary; however, in the absence of such consent, the ADV may not be able to comply with certain contractual obligations related to processing of such data.

**Categories of recipients of personal data.**

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

- the internal staff of the ADV, as the person in charge and / or in charge of the processing;
- to the suppliers of tourist services included in the packages sold, or who lend the connected or individual services purchased at the ADV;
- to insurance companies that lend the accessory covers and connected with the packages and tourist services purchased;
- persons, companies, associations or professional firms that provide services or activities of assistance and advice in favor of the ADV in order to protect their own right (for example, trade
- lists, lawyers, tax advisors, auditors, consultants in the field of auditing or due diligence , etc.);
- persons, companies, or agencies that provide marketing and analysis services or consultancy services in favor of the ADV;
- subjects to whom the right to access your data is recognized by provisions of law and secondary legislation or by provisions issued by Authorities legitimated by the law, including the airport, port, customs and border authorities.

**Transfer of personal data outside the European Union.**

Your personal data may be transferred abroad to third party companies belonging to the European Union or not, always for the purposes indicated above.

In the event of data transfer to countries outside the European Union, these countries will ensure an adequate level of protection based on a specific decision of the European Commission or alternatively, the recipient will be contractually obliged to protect data with an adequate level comparable to the protection provided by the GDPR.

**Storage of personal data.**

Personal data will be stored for a period not exceeding that necessary to achieve the purposes for which they were collected and subsequently processed. The data lost will be kept for the duration of the contract you have concluded and also for a later period:

- i within the terms established by the current legislation;
- ii. within the terms established by the secondary legislation that require data retention (for example, tax returns);
- iii. within the period necessary to protect the rights of the data owner in the event of any disputes related to the provision of the service.

Personal data collected and processed for profiling purposes will be kept for a maximum period of ten (10) years after which they will be automatically deleted or made anonymous in a permanent way.

Data Controller and Data Processors.

The Data Controller is the Tour Operator located in Trento. The appointed Data Protection Officer is contactable to the following addresses: PEC thol@pec-mail.it or by registered mail at support@thol.it

Rights of the interested party.

At any time, pursuant to arts. 15 to 22 of the GDPR You have the right, also in relation to the profiling activity, of:

- ask the holder for access to your personal data and information relating thereto; the correction of inaccurate data or the integration of incomplete data; cancellation of personal data concerning you (upon the occurrence of one of the conditions indicated in Article 17, paragraph 1 of the GDPR and in compliance with the exceptions provided for in paragraph 3 of the same Article); the limitation of the processing of your personal data (upon the use of one of the hypotheses indicated in Article 18, paragraph 1 of the GDPR);
- request and obtain from the holder - in the cases in which the legal basis of the treatment is the contract or consent, and the same is done by automated means - your data personal data in a structured and readable format by automatic device, also in order to communicate such data to another data controller (so-called data portability right)
- oppose at any time the processing of your personal data to the occurrence of particular situations that affect you;
- withdraw consent at any time, limited to the cases in which the processing is based on your consent for one or more specific purposes and concerns common personal data (eg date and place of birth or place of residence), or particular categories of data (eg data revealing your racial origin, your political opinions, your religious convictions, the state of health or sexual life). The treatment based on consent and carried out prior to the revocation of the same preserves, however, his lawfulness;
- propose a complaint to a supervisory authority (Authority for the protection of personal data - [www.garanteprivacy.it](http://www.garanteprivacy.it)).