



Information on the processing of personal data pursuant to art. 13-14 EU Reg. 2016/679

Data subjects: customers

CONSORZIO TURISTICO INCOMING EXPERIENCE, in its capacity as Data Controller of your personal data, pursuant to and in accordance with EU Reg. 2016/679, hereinafter 'GDPR', hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

Your personal data, including special data (health data for certain requested services) will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations therein.

Purposes and legal basis of the processing: in particular, your data will be processed for the following purposes in connection with the fulfilment of legal or contractual obligations:

- Management of the contractual relationship with the customer, including pre- and post-contractual activities. (e.g. performance of a contract)
- Further fulfilments related to the activities carried out by the Data Controller such as: management of bookings, organisation and intermediation in the purchase of stays and/or tourist packages selected by you (e.g. performance of a contract - for special data e.g. implied consent - unequivocal positive act)
- Statutory obligations in the field of taxation and accounting (e.g. legal obligation)
- Fulfilment of legal obligations, regulations, national and/or EU provisions (e.g. legal obligation)
- Sending communications to request feedback on the service used (e.g. legitimate interest)
- defensive investigation activities to ascertain, exercise or defend a right in court (e.g. legitimate interest of the Data Controller)

The processing of functional data for the fulfilment of these obligations is necessary for the proper management of the relationship and their provision is mandatory for the fulfilment of the above-mentioned purposes. The Data Controller also makes it known that failure to provide, or the incorrect communication of, any of the mandatory information may make it impossible for the Data Controller to guarantee the appropriateness of the processing itself.

The processing of personal data based on consent is not compulsory, their provision is optional, but indispensable for providing the services requested.

Processing methods: your personal data may be processed in the following ways:

- processing by means of electronic computers
- manual processing by means of paper archives

All processing is carried out in compliance with the methods set out in articles 6, 32 of the GDPR and through the adoption of appropriate security measures.

Communication: your data may be communicated exclusively to the public bodies and offices to which the fiscal data must be communicated (e.g. Revenue Agencies) as well as to banks and credit institutions; to consortium members (e.g. hotels, tourist guides) for the management of the services requested; in case of necessity for the performance of the requested services, to competent persons duly appointed to perform the services necessary for the proper management of the relationship, such as consultants and service providers, with guaranteed protection of the rights of the data subject.



Your data will only be processed by personnel expressly authorised by the Data Controller.

Dissemination: Your personal data will not be disseminated in any way.

Retention period: Please note that, in accordance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to art. 5 of the GDPR, the retention period for your personal data is:

- **accounting and tax data:** 10 years in compliance with obligations to keep accounting and tax records (art. 2220 of the Civil Code, which provides for accounting records to be kept for 10 years; art. 22 of Pres. Decree no. 600 of 29 September 1973)
- **other data:** 10 years from the time the contract ceases to be effective or, in the event of a dispute, for the limitation period provided for by the law for the protection of related rights

Data subjects' rights

1. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning him/her, even if not yet recorded, and its communication in intelligible form.
2. A data subject shall have the right to be informed:
 - a. of the source of the personal data;
 - b. of the purposes and methods of the processing;
 - c. of the logic applied to the processing, if the latter is carried out with the help of electronic means;
 - d. of the identification data concerning the data controller, data processors and the representative designated as per Section 5(2);
 - e. of the entities or categories of entities to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
3. A data subject shall have the right to obtain:
 - a. the updating, rectification or, where interested therein, integration of the data;
 - b. erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
 - c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
 - d. data portability.
4. A data subject shall have the right to object, in whole or in part:
 - a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
5. The data subject has the right to request the restriction of processing.

He/she may exercise his/her rights by sending an e-mail to info@hotelexperience.net or by sending a written request to the above-mentioned addresses.

In addition, if the data subject considers that the processing of his/her data is contrary to the legislation in force, he/she may lodge a complaint with the Data Protection Supervisory Authority pursuant to art. 77 of Regulation 2016/679 or submit a report pursuant to art. 144 of Legislative Decree 101/2018.



Data subjects: suppliers

CONSORZIO TURISTICO INCOMING EXPERIENCE, in its capacity as Data Controller of your personal data, pursuant to and in accordance with EU Reg. 2016/679, hereinafter 'GDPR', hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

Your personal data, and those of the natural persons acting on behalf of your company as persons responsible, will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations therein.

Purposes and legal basis of the processing: in particular, your data will be processed for the following purposes in connection with the fulfilment of legal or contractual obligations:

- Management of orders and contracts (e.g. performance of a contract)
- Statutory obligations in the field of taxation and accounting (e.g. legal obligation)

The processing of functional data for the fulfilment of these obligations is necessary for the proper management of the relationship and their provision is mandatory for the fulfilment of the above-mentioned purposes. The Data Controller also makes it known that failure to provide, or the incorrect communication of, any of the mandatory information may make it impossible for the Data Controller to guarantee the appropriateness of the processing itself.

The processing of personal data based on consent is not compulsory, their provision is optional, but indispensable for providing the services requested.

Processing methods: your personal data may be processed in the following ways:

- processing by means of electronic computers
- manual processing by means of paper archives

All processing is carried out in compliance with the methods set out in articles 6, 32 of the GDPR and through the adoption of appropriate security measures.

Communication: your data may be communicated exclusively to the public bodies and offices to which the fiscal data must be communicated (e.g. Revenue Agencies) as well as to banks and credit institutions; to consortium members (e.g. hotels, tourist guides) for the management of the services requested; in case of necessity for the performance of the requested services, to competent persons duly appointed to perform the services necessary for the proper management of the relationship, such as consultants and service providers, with guaranteed protection of the rights of the data subject.

Your data will only be processed by personnel expressly authorised by the Data Controller.

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