



Information on Personal Data Processing and Obtaining User Consent

The tour operator Active Travel Tuscany by TURISMO SOSTENIBILE SRL, as data controller, pursuant to article 13 of the General European Regulation on the Protection of Personal Data 679/2016 (hereinafter the "GDPR") provides the following information about the processing of personal data that you, as a party concerned, have communicated to us:

- a) for organizing tourist packages;
- b) for facilitating the purchase of related tourist services;
- c) for mediating the purchase of tourist packages organized by third parties or of individual tourist services provided by third-party suppliers (e.g. hoteliers, carriers);
- d) for mediating the purchase of ancillary financial /insurance services that are linked to tourist packages / services facilitated or purchased individually (medical - luggage - cancellation insurance policies as well as assistance to travelers in difficulty, financing consumer credit);
- e) for fulfilling the assignment of obtaining visas;
- f) for registering on our website and / or the app or filling out the forms on the website or in the app.

Purpose and Legal Basis of the Processing

Furthermore, among the data you provided there could also be some personal data defined by the GDPR and by the Italian regulation as "sensitive" (e.g. health, judicial data). The sensitive data shall be processed according to the purposes indicated below and only with your express consent.

- a) **Purposes related to the contractual provision** - Your personal data shall be processed for meeting the obligations arising from the negotiation and the contract about the organization of the tourist package, or the mandate to facilitate the purchase of connected tourist services or the mandate to mediate the purchasing of individual tourist services or in any case for performing the obligations arising from all contractual relationships, including the phase of negotiations, indicated in the previous letters from a) to f), in order to allow the travel agency to provide optimal performance, in particular for:
 - i. concluding, managing and executing the contractual relationships between you and the travel agency;
 - ii. answering your requests;
 - iii. communicating notices, relating to the tourist package or services purchased or other additional and accessory services (e.g. information on the purchased tourist services, modification of the contractual conditions, cancellations);
- b) **Legal purposes.** Your personal data shall also be processed for:
 - i. implementing legal obligations, regulations, national, EU and international regulations or deriving from provisions issued by legally legitimated Authorities;
 - ii. ascertaining, exercising and / or defending during legal and judicial disputes, the travel agency's right;
 - iii. fulfilling the obligations envisaged in the tax and accounting fields;
 - iv. fulfilling the obligations connected to travelers' safety and health regulations;
 - v. fulfilling obligations connected to passenger and freight transport regulations.
- c) **Purposes linked to the business activity and statistics.** Your personal data shall also be processed for purposes relevant for or related to the activity carried out by the tour operator and for anonymously processing statistics and market research:
- d) **Additional purposes.** Furthermore, if you expressly consent to it, your personal data will be processed for the following purposes:
 - i. **Marketing purposes**, which include:
 - a) Promotional activities of the travel agency, and / or of commercial partners, implemented both with automated methods (i.e. emails, text messages, instant messaging applications, etc.) and with non-automated methods (i.e. ordinary mail, telephone calls by an operator, etc.). In particular, the travel agency may use your email address, provided at the time of purchasing the packages or tourist services, to send you information and promotional communications linked to similar services and products offered by the travel agency and / or by commercial partners even without your consent, provided you do not object to such use.
The commercial partners are part of the following categories:
 1. hospitality companies;
 2. airlines / sea transport companies; railway carriers; bus lines;
 3. travel agencies and travel agency networks;
 4. insurance companies.
 - 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 in keeping with your interests. Such activity may also take place through satisfaction questionnaires and / or the use of profiling cookies while you are surfing our sites and apps.

The processing 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 the Refusal to Give Consent

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 contractual and legal performance) the requested performance or part of it cannot be performed and you will not be able to take advantage of the opportunities mentioned above.

The provision of optional data will enable the travel agency to improve the services offered in order to make them increasingly responding to the personal interests of its customers.

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

Categories of Personal Data Recipients

Your information shall 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 travel agency, as the Data Controller and / or Data Processor;



- to the tourist service suppliers included in the packages sold, or those who shall provide the connected or individual services purchased from the travel agency;
- to insurance companies that shall provide the accessory insurance coverage and connected with the purchased packages and tourist services;
- natural and legal entities, associations or professional firms providing services or assistance and counseling activities in favor of the travel agency in order to protect their right (for example, accountants, lawyers, tax advisors, auditors, consultants in connection with auditing or due diligence, etc.);
- natural or legal entities or agencies providing marketing and analysis services or advisory services in favor of the travel agency;
- entities whose right to access your data is recognized by legal provisions and secondary regulations or by provisions issued by legally legitimated Authorities, including 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 above mentioned.

In case of data transfer to countries outside the European Union, these countries shall guarantee an adequate level of protection based on a specific decision of the European Commission or alternatively the recipient shall be contractually obliged to data protection with an appropriate and comparable level to the protection provided by the GDPR.

Personal Data Storage

Personal data shall be stored for a period not exceeding the time necessary to achieve the purposes for which they were collected and subsequently processed. Personal data shall be kept for the whole duration of the contract you have signed and also for a subsequent period:

- i. within the terms established by the current legislation;
- ii. within the terms established by the legislation (even a secondary one) 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 as to the provision of the service.

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

Data Controller and Data Processors

The Data Controller is the tour operator Active Travel Tuscany by TURISMO SOSTENIBILE SRL based in Piazza Virgilio 34, 57037 Portoferraio (LI), legal representative Marino Garfagnoli.

Data Protection Officer (DPO)

The appointed Data Protection Officer shall be Marino Garfagnoli who can be contacted at the following addresses: electronic certified mail (IPEC) turismosostenibile@pec.it or by registered mail to Active Travel Tuscany – Turismo Sostenibile Srl, Piazza Virgilio 34, 57037 Portoferraio (LI), Italy.

Rights of the Party Concerned.

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

- ask the Data Controller for accessing your personal data and information relating to them; correcting inaccurate data or the integration of incomplete data; cancelling 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); limiting your personal data processing (on the use of one of the hypotheses indicated in Article 18, paragraph 1 of the GDPR);
- request and obtain from the Data Controller - if the legal basis of the data processing is the contract or consent, and the same is done by automated means - your personal data in a structured and readable format by an automatic device, also in order to communicate such data to another data controller (so-called right to the portability of personal data);
- oppose at any time the processing of your personal data in case of particular situations that affect you;
- revoke your consent at any time, limited to the cases where the processing is based on your consent for one or more specific purposes and concerns common personal data (for example date and place of birth or place of residence), or special categories of data (i.e. data revealing your racial origin, your political opinions, your religious beliefs, your health status or your sex life). The processing based on consent and carried out prior to the revocation of the same preserves, however, its lawfulness;
- lodge a complaint to a supervisory authority (Authority for the Protection of Personal Data -www.garanteprivacy.it).

Provision of Consent to Personal Data Processing

A) Having read the information above, I hereby consent to my personal data processing, in accordance with the methods shown, for the purposes provided for in items a) and b) (purposes related to the contractual and legal service)

I give my consent

I do not give my consent

B) Having read the information above, I hereby consent to the processing, in accordance with the methods provided for, of my personal data for the purposes shown in item c) (business-related purposes and statistics)

I give my consent

I do not give my consent

C) Having read the information above, I hereby consent to my personal data processing, in accordance with the methods provided for, for the purposes shown in point d) (marketing purposes).

I give my consent

I do not give my consent

Name: _____ Place/date: _____

signature: