

INFORMATION NOTICE FOR WEBSITE WWW.VISITRIMINI.COM

FOREWORD

Why this document? National and international data protection rules require the data subject to be informed about their personal data being processed and who will process it, in order to ensure that the processing is fair and transparent. The following will therefore clearly list **who** will process the data, **what** personal data will be processed, **the purposes** for which the personal data will be processed, for **how long** the data will be processed, the data subject's **rights** are and **how to exercise them**.

What standards does this document refer to? The information is provided taking into account the combined provisions of the following regulations:

- European Data Protection Regulation (GDPR) EU 2016/679 (hereinafter 'Regulation')
- Legislative Decree. 196/2003 as amended by Legislative Decree 101/2018 (hereinafter referred to as "Code")
- European Directive 2002/58/EC, so-called 'ePrivacy', and GPDP provision n. 231 of 10/06/2021

INFORMATIVE NOTICE

1) DATA HOLDER

Rimini Welcome Destination Management Company soc. cons. a r.l. with headquarters in via Sassonia 30, 47922 Rimini (RN), Tel. (+39) 0541 51441, e-mail privacy@visitrimini.com, certified email: rwdmc@legalmail.it

Data Protection Officer (DPO): PRIVACY365 Italia S.r.l. viale Berna 9/B, 47924 Rimini (RN), e-mail dpo@privacy365.eu, PEC: dpo.privacy365italia@pec.it, Tel. (+39) 0541 1647198

2) PURPOSE, LEGAL BASIS, RETENTION TIME AND NATURE OF PROCESSING

Based on the actions carried out by the data subject, personal data will be processed for the following purposes:

a. Booking a hotel or an experience via the Trekksoft booking platform:

- the legal basis for this processing is the need to perform a contract in which the data subject is a party, as set out in the Terms of Service or Booking;
- the retention period of data processed for this purpose is the duration of the contract and, in the case of legal disputes, for the entire duration of the same, until the time limit for appeals has been exhausted. Data will also be retained in accordance with the timing provided for by administrative, tax and civil law;
- personal data required are necessary to process the purchase, and any refusal to provide them will make it impossible to process the purchase order.

b. Responding to requests received via the online chat platform:

- the legal basis for this processing is the need to carry out pre-contractual or contractual measures taken at the request of the data subject;
- the retention period of data processed for this purpose is equal to the time necessary to process the request;
- personal data requested are necessary to process the request, and any refusal to provide them will make it impossible to reply to the data subject.

c. Respond to requests received via the online form:

- the legal basis for this processing is the need to implement pre-contractual measures taken at the request of the data subject;
- the retention period of data processed for this purpose is equal to the time necessary to respond to the request;
- personal data marked with an asterisk (*) are necessary to process your request, and any refusal to do so will make it impossible for us to respond to you.
- Sending information and promotional material (soft spam), including by e-mail and SMS (mailing lists, offers, etc.), on products or services similar to those previously provided:
- the legal basis for this processing is the pursuit of the legitimate interest of the Data Holder in offering products or services similar to those previously provided to its customers. Further information on the logic applied and the protections provided for the data subject are available by sending a written request to the Data Holder;
- the retention period of data processed for this purpose is until the data subject requests to unsubscribe from the promotional communication service.
- Sending information and promotional material (direct marketing), including by e-mail and SMS (newsletters, etc.):
- the legal basis for this processing is the explicit consent of the data subject;
- the retention period of data processed for this purpose is until the data subject requests to unsubscribe from the promotional communication/newsletter service. Please note that consent may be withdrawn at any time, without affecting the lawfulness of the processing prior to withdrawal;
- the provision of personal data is optional and refusal to provide them will result in the impossibility of receiving information and promotional material.

- Analysing consumption habits and choices (profiling), conducting market research (customer satisfaction surveys and analysis):
- the legal basis for this processing is the explicit consent of the data subject;
- the retention period for data processed for this purpose is until the data subject withdraws their consent. Please note that consent may be withdrawn at any time without affecting the lawfulness of the processing prior to withdrawal;
- further information on the logic applied and the protections provided for the data subject are available by sending a written request to the Data Holder;
- provision of personal data is optional and refusal to provide it will make profiling impossible.
- Administrative and management purposes and for the fulfilment of obligations required by law, regulations or order of the Authority (e.g. tax formalities, administrative and accounting management, etc.):
- the legal basis derives from the need to comply with a legal obligation to which the data holder is subject;
- the storage period of data processed for this purpose is linked to individual legal obligations regulated by specific reference regulations;
- provision of personal data is compulsory, as the data holder must comply with a legal obligation to which it is subject, or with requests from competent authorities.
- Preventing, detecting and prosecuting unlawful conduct:
- the legal basis for this processing is the pursuit of the Data Holder's legitimate interest in preventing, detecting and prosecuting unlawful acts or infringements of intellectual/industrial property rights (including those of third parties) or computer crimes or crimes committed by means of telematic networks. Further information on the logic applied and the protections provided for the data subject, are available by sending a written request to the Data Holder;
- the period of retention of data processed for this purpose shall be as long as is reasonably necessary to enforce the rights of the data holder from the time when the offence or potential offence was discovered.
-
- **PERSONAL DATA PROCESSED**
- Processing of personal data means any operation or set of operations performed upon personal data or sets of personal data, by automatic or analogue means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use , disclosure by transmission, dissemination or otherwise provision, alignment or combination, restriction, erasure or destruction.
- The data subject may also send (e.g. contact form in the "message" field) to the Data Holder data that can be qualified, pursuant to art. 9 of the Regulation, as 'special categories of personal data', namely those data revealing racial or ethnic origins, political opinions, religious or philosophical beliefs, or trade union membership, data concerning the health or sex life or sexual orientation of the individual. This category of data will be processed by the Data Holder for the purpose of processing the request received. Further processing of special data categories by the Data Holder will only be carried out with the express prior consent of the data subject.
-
- Further personal data that may be processed include:
- Navigation data: The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols . This category of data includes IP addresses or domain names of the computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) addresses of the resources requested, time of the request, method used to submit the request to the server, size of the file obtained in response, numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment. These data, which are necessary to use the web services, are also processed in order to obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.) and to check the correct functioning of the services offered. Navigation data do not persist for more than 365 days and are deleted immediately after their aggregation (except in the case of criminal investigations by the judicial authorities).
- Data provided by the user: The optional, explicit and voluntary sending of messages to the contact addresses of the Data Holder
- involve the acquisition of the sender's contact details, which are necessary to reply, as well as any personal data included in the communications.
- Cookies and other tracking systems: Please refer to the detailed information available at the following link: www.visitrimini.com/cookie-policy

3) RECIPIENTS OF PERSONAL DATA

Personal data may be shared, for the above purposes, with:

- persons who typically act as "Data Processors", pursuant to Art. 28 of the Regulation, i.e. persons, companies or professionals providing assistance and advice to the Data Holder, in relation to the provision of services/products;

- subjects with which it is necessary to interact for the provision of services, as independent Data Holders (e.g. access through social networks, etc.) in order to offer the user the method of payment by credit card, managed by the provider Treksoft AG (CH); at checkout, the Data Holder will transmit to Treksoft your personal data in the form of contact details and order details, so that Treksoft can manage the payment;
- subjects, Bodies or Authorities to whom it is mandatory to communicate your personal data, by virtue of legal provisions or orders of the Authorities;
- personnel expressly authorised by the Data Holder, to carry out activities strictly related to the provision of the services/products, who have committed themselves to confidentiality or have an adequate legal obligation of confidentiality and have received adequate operating instructions pursuant to Art. 29 of the Regulation.

The full list of Data Processors is available by sending a written request to the Data Holder.

4) TRANSFER OF PERSONAL DATA

Some personal data is shared with recipients who may be located outside the European Economic Area (EEA). The Controller ensures that processing of your personal data by these recipients is carried out in compliance with the Regulation. Indeed, transfers may be based on an adequacy decision or on Standard Contractual Clauses approved by the European Commission. More information is available from the DataHolder.

5) EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS, INCLUDING PROFILING

The Data Holder does not adopt an automated decision-making process concerning the processing of personal data, including profiling, as referred to in Article 22 of the Regulation. More information is available from the Data Holder.

6) DATA RELATING TO MINORS

Information society services, such as newsletter subscription (direct marketing), profiling and online chats, may only be used by persons who are at least 16 (sixteen) years old. The Data Holder shall not be liable in any way for collecting personal data - or for any misrepresentation - provided by a minor, and, in any case, should the use of such data be detected, the Data Holder shall facilitate the right of access and cancellation forwarded by the guardian, custodian or person exercising parental responsibility.

7) RIGHTS OF THE DATA SUBJECT

The Data Subject has the right to obtain from the Data Holder, in the cases provided for, access to and rectification or cancellation of personal data or restriction of processing concerning them, or to object to processing (Art. 15 et seq. of the Regulation). The appropriate request to the Data Holder is made by contacting the e-mail address responsible for responding to the interested party or by filling in the form available in the dedicated privacy area.

8) RIGHT OF COMPLAINT

If the data subject considers that the processing of personal data relating to them is in breach of the provisions of the Regulation, they have the right to lodge a complaint with the Italian Data Protection Authority (www.gpdp.it), as provided for by art. 77 of the Regulation, or to bring an action before the appropriate courts (Art. 79 of the Regulation)

9) WAYS OF EXERCISING YOUR RIGHTS

To exercise the above rights, you may access the Privacy section of the website www.visitrimini.com, use the form provided, or contact the person responsible for responding to the data subjects:

- Data Holder: Tel. (+39) 0541 51441, e-mail privacy@visitrimini.com, certified email rwdmc@legalmail.it
- Data Protection Officer (DPO): Tel. (+39) 0541 1647198, e-mail dpo@privacy365.eu, certified email: dpo.privacy365italia@pec.it

10) CHANGES

The Data Holder reserves the right to amend and/or supplement this Policy at any time, and undertakes to publish the changes on the website www.visitrimini.com, Privacy section. Data subjects are invited to check its content periodically. This notice is effective from 27/07/2021.