

## PRIVACY POLICY

The following provisions on personal data processing are directed to all users who access and/or register on the website [www.in-lombardia.it](http://www.in-lombardia.it) ("**Website**") owned by and managed by Explora S.c.p.a., with registered office in Milan (Italy), Via Fabio Filzi, 22, VAT number 08344310969 and they are prepared in conformity with existing regulations and, in particular, the provisions of Italian Legislative Decree 30 June 2003, no. 196, *Personal Data Protection Code* ("**Privacy Code**") as amended and supplemented and, insofar as is necessary here, EU Regulation 2016/679 ("**Regulation**") and they constitute, to all effects, a privacy policy in accordance with the cited regulations.

We strongly advise Website Users ("**Users**") to consult this document frequently, so as to be aware of any variations or modifications made to the same mainly as a result of regulatory changes. In any case, any updates to this privacy policy will be highlighted on the Website home page.

By accessing the Website, the User acknowledges and declares to be aware of the terms and conditions of this privacy policy ("**Policy**") and any amendments to the same.

Any third party websites connected by way of links found on the Website are regulated by a separate privacy policy which is not part of this policy and with respect to which Explora S.c.p.A. does not have and does not accept any liability.

### 1. Type of personal data and collection method

#### *Browsing data*

The IT systems and software processes used for the functioning of the Website acquire, during their normal operation, some personal data whose transmission is implicit in use of the Internet network, which is based upon protocol TCP/IP.

This is information that is not collected to be associated with identified data subjects but which may, by its very nature, through processing and association with data held by third parties, allow for the browsing users to be identified.

This category of data includes "IP addresses" or domain names of the computers used by users who connect to the website, addresses in URI (*Uniform Resource Identifier*) notation of the requested resources, the time of the request, the method used to submit the request to the web server, the size of the file obtained in response, the numerical code indicating the status of the response given by the web server (successful, error, etc...) and other parameters relating to the User's operating system and computer environment. These data are used for the sole purpose of obtaining anonymous statistical information on use of the website and to check the correct functioning of the Website.

The aforementioned data may be used to ascertain liability in the case of computer crimes in detriment to the Website and to other websites connected or linked to it.

The User is also informed that the Website uses “cookie” technology. For further information in that regard, see the specific “Cookie Policy” [enter link to document].

#### *Data provided voluntarily by the User*

In accordance with Article 4, 1st paragraph, letter b) of the Privacy Code, “personal data” means “any information relating to an identified or identifiable natural person, even indirectly, by reference to any other information, therein including a personal identification number”.

Personal data shall therefore mean the name, e-mail and contact details, as well as any other information of the User that is, directly or indirectly, obtainable from the latter.

Personal data provided voluntarily by the User may be collected according to one of the following methods:

- (i) when completing electronic forms aimed at the uploading and posting of consents relating to the services offered and/or for the request for information or to book a service, the User will be asked to complete specific fields and/or electronic forms and to provide some personal data relating to him/her (including, by way of example and without limitation, name and surname; company name; name of a contact person; postal address; e-mail);
- (ii) when requesting registration to Website newsletters, Users will be asked to leave their names and e-mail addresses.

## **2. Processing Controller**

The data sent and/or collected by one of the methods indicated in paragraph 1 above and/or with other tools on the Website will be processed by Explora S.c.p.a., in the person of its acting legal representative, in the capacity of processing controller (“**Controller**” or “**Explora**”).

## **3. Purpose and method of processing - Mandatory or optional nature of data provision**

Subject to the provisions of the general terms and/or the contracts entered into with Explora and/or other documents posted on the Website, the personal data collected via the Website will be processed for the purposes indicated below:

- (i) *Registration on the Website and, where provided, account (reserved areas) created on the Website:* for the conduct of the activities necessary for and/or connected to registration and/or creation and management of a personal account created by the User and for using and exploiting the services and tools on the Website, therein including the posting and uploading of information and illustrative material relating to the structure and services offered (in the case of a supplier of ancillary services).
- (ii) *Newsletters:* for sending by e-mail Explora's official newsletter, or other types of communication, periodic or otherwise, concerning activities, services or information relating mainly to the tourism

industry in Lombardy. To pursue those purposes the provision of personal data is optional and the User will be asked to provide his/her consent.

- (iii) *Communications sent by the User also in relation to ancillary services offered by economic operators:* information requests sent by e-mail or by another instrument to the details indicated on the Website, will be processed exclusively to the extent necessary to proceed with the request made by the User. For that purpose, the provision of data is mandatory, and, in its absence, the request made by the User cannot be processed.
- (iv) *Statistical analyses and market research* in relation to the tourism offer and, in general, the tourism industry in the Lombardy Region and strictly relating to the institutional activity of Explora and/or its partners. Those analyses will be conducted on anonymous, anonymised or in any case aggregated data.

Without prejudice to the foregoing and even irrespective of the context in which the personal data were collected, the same will be processed by the Controller for the fulfilment of obligations provided by laws, regulations and the community and/or national legislation, as well as by provisions imparted by authorities legitimated by law or by supervisory or control bodies, internal and/or external to the Controller's structure, also for the prevention and ascertainment of computer crimes.

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In relation to the purposes indicated above, the personal data processing occurs using manual, electronic and IT tools, by persons specifically identified as processing "officers" or in any case specifically authorised to process the data (as officers of the Administration Department, Marketing Department, etc.), with logics strictly related to the purposes in question, as well as, in any case, in order to protect, as far as is reasonable and in line with the state of the art, the security and confidentiality of the same by way of adequate procedures that avoid the risk of loss, unauthorised access, unlawful use and dissemination.

The User is informed that the respective personal data may be stored for the period of time strictly necessary to pursue the purposes indicated in this Policy and in any case for the maximum time provided by applicable provisions of law on limitation of rights and/or forfeiture of the action. Further information on the personal data storage period and the criteria used to determine that period can be requested by writing to the Controller at the address indicated in the epigraph.

**The Controller will not use Users' personal data for purposes other than those reported here and, in particular, to send communications not requested by those Users or for which the latter have not requested a service or provided their consent, where necessary in accordance with the law.**

#### **4. Entities - communication of Data**

For the pursuit of the purposes indicated in Article 3 above, the personal data of Users may be communicated and/or sent to other entities, including in particular:

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- to entities, legal and/or natural persons, instructed by the Controller to perform technical repairs and ordinary and extraordinary maintenance interventions. restoration and update interventions of the Website;
- to consultants, legal and fiscal, of Explora for the execution of legal fulfilments.

The full and updated list of entities appointed as processors is available at the registered office of the Controller indicated in the epigraph.

In addition, when intending to make a booking via the Website or to request information on a specific service, the personal data of the User and/or the personal data provided by the latter by completing specific fields and/or electronic forms will be communicated to the operator and supplier of the booked service and/or that to which the request is directed which will process them in the capacity of autonomous controller under the terms and conditions that must be autonomously explained by the latter. That communication is essential to be able to pursue and process the User's request.

Subject to the foregoing, the Controller does not transfer or otherwise make available to third parties, subject to express consent of the User, any personal data provided to it by the User itself, with the exception, where necessary, of a decision by the judicial authority or other competent authority.

The data will not in any case be disseminated, except in anonymous and aggregated form.

## **5. Personal data security**

In any case, the personal data provided by the User will be processed in full respect of the provisions of Italian Legislative Decree no. 196/2003 and suitable and preventive security measures will be adopted to safeguard the confidentiality, integrity, completeness, availability of the personal data of the data subject. In accordance with the provisions of Part I, Title V, *Security of data and systems*, Italian Legislative Decree no. 196/2003 and respective technical rules (Annex B), technical, logical and organisational measures are developed which have as their aim the prevention of damages, losses, even accidental, alterations, improper and unauthorised use of processed personal data.

## **6. Rights of the User**

Finally, the User is informed that, in accordance with Article 7 of the Privacy Code and, if and insofar as it is applicable, the regulation, in the capacity of data subject, it has the right to (i) access the data (therein including for the purpose of knowing the origin of the data, the purposes and methods of processing and the logic applied to the same, as well as the identification details of the controller, processor and categories of entities to which the data may be communicated), (ii) update and rectify and erase the data (therein including the right to obtain the respective pseudonymisation or block), (iii) request the limitation of processing or object to the processing, (iv) request the data portability, (v) revoke, at any time, the consent provided. The User may also lodge a complaint with the Supervisory Authority.

To exercise those rights Users may send a communication to Explora at the address indicated in the epigraph, for the attention of the Processing Controller, or by email to [privacy@exploratourism.it](mailto:privacy@exploratourism.it).

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In the case of discrepancies between the contents of this Policy and what is indicated in general terms posted on the Website and/or in specific contracts concluded by the User with Explora, the contents of the latter documents will prevail. It is also noted that further information and specifications in relation to specific processing of personal data of the User implemented by Explora may be provided within additional information and contractual documents with respect to this Policy and that they will supplement their contents in relation to the context in which the personal data are acquired each time.

This Policy is subject to Italian law.