

CUSTOMER INFORMATION

INFORMATION ON THE PROCESSING OF PERSONAL DATA

This communication is made available to you - pursuant to art. 13 and 14 of the European Regulation 2016/679 regarding the protection of personal data ("Regulation" or "GDPR") - and is aimed at Customers who use the services provided by the Data Controller. This information aims to inform the user about the methods of processing of personal data concerning him. All data are processed in a lawful, correct and transparent manner towards the interested party, in compliance with the general principles established by EU Regulation no. 2016/679 and current legislation on the protection of personal data.

1. DATA CONTROLLER

The Data Controller is CAVOURESE S.p.A., Tax Code and Turin Company Register no. 00519860019, REA Turin n. 187789, VAT number 00519860019, tel. +390113970000, email privacy@cavourese.it. The Data Controller has designated a Data Protection Officer (DPO) who can be contacted at the email address privacy@cavourese.it.

2. TYPES OF DATA COLLECTED

The Data Controller processes some personal data received or collected for the purpose of executing service sales contracts. This may include identification and contact data (such as address, telephone numbers and e-mail), those relating to the chosen payment method (such as the credit card number, Data Controller, expiry date and code safety). We may also request data relating to an identity document and other particular data based on the specific needs of users.

The processing of such personal data is carried out by the Data Controller to manage relationships with users and manage contracts for the sale of travel tickets, involves the collection of requests to purchase services from Customers, both through the applications available on the site internet of the Data Controller, or through direct requests.

Credit card payments are managed through the Nexi and Paypal payment services. Payment details and personal information are processed directly by such payment service providers, the Data Controller is not involved in the collection and processing of such information, he will only receive a notification from the relevant payment service provider about the payment.

The forms on the site collect identification and contact data provided voluntarily by the user. Failure to provide them may make it impossible to obtain what is requested. The Data Controller will use this information only to respond to user requests and to provide the requested services.

3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

The processing of such personal data has the following purposes:

- a) the collection of requests to purchase services from Customers, the conclusion of the contract and the execution of the services that form the subject of the contract itself. In the absence of such data it may not be possible to establish or correctly execute the contracts in question;
- b) direct marketing activities aimed at its customers, who are in any case guaranteed the right to object to such processing, at any time and free of charge; in the event of opposition, the customer's personal data will no longer be processed for these purposes;
- c) only if the Customer expressly consents, the identification and contact data may be processed by the Data Controller for the purposes of information or commercial promotion by the Data Controller or Autoguidovie Group company, and for carrying out surveys to detect the degree of satisfaction of customers.

The legal basis of the processing consists of:

- for the purposes referred to in point a), the need to satisfy the customer's request for Services, the fulfillment of the relevant contractual and pre-contractual obligations in place, as well as the fulfillment of the related legal obligations;
- for the purposes referred to in point b), from the legitimate interest of the Data Controller in carrying out direct marketing initiatives towards its customers, in consideration of the relationship

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established with them and the protection of their fundamental rights, also guaranteed through the right of opposition mentioned above;

- for the purposes referred to in point c), by the consent freely expressed by the interested party.

4. METHOD, PLACE AND DURATION OF PROCESSING

Personal data is processed electronically and on paper. The processing is carried out using organizational methods and with logic strictly related to the purposes indicated.

The Data Controller has implemented technical and organizational measures to provide an adequate level of security and confidentiality to personal data. These measures take into consideration the state of the art of the technology, the costs of its implementation, the nature of the data and the risks associated with its processing. The purpose is to protect data from accidental or unlawful destruction or alteration, accidental loss, unauthorized disclosure or access, and from other unlawful forms of processing.

The data is processed at the Company's headquarters and at companies appointed and duly appointed as Data Processors.

Personal data processed for legal and contractual obligations will be retained for 10 years, without prejudice to any retention terms established by laws or regulations.

Personal data processed for direct marketing purposes will be kept for 2 years from the last commercial interaction with the Customer.

Personal data processed with the consent of the interested party for information or commercial promotion purposes will be retained until the consent itself is revoked.

Other personal data collected as part of the provision of services will be kept for the time strictly necessary to provide the service.

5. CATEGORIES OF SUBJECTS TO WHOM THE DATA MAY BE COMMUNICATED

The data collected by the Data Controller will be shared only for the above purposes; we will not share or transfer your personal data to third parties other than those indicated in this Policy. During our activities, personal data may be communicated to the following categories of recipients:

- transport service providers;
- hosting providers, IT companies, communication agencies, third-party technical services;
- people, companies or professional firms that provide assistance and consultancy to the Data Controller in accounting, administrative, legal, tax and financial matters;
- subjects whose right to access the data is recognized by legal provisions or orders from the authorities.

These subjects are also appointed, where appropriate, as Data Processors by the Data Controller. The updated list of Managers can always be requested from the Data Controller.

6. USERS' RIGHTS WITH REGARD TO THEIR PERSONAL DATA

The interested party, i.e. the natural person to whom the personal data refers, has the right to ask the Data Controller to access their personal data, to rectify or delete them, as well as to request the limitation or oppose their processing. The interested party is also the holder of the right to data portability. To exercise these rights, you can refer to the contacts indicated in this information.

All requests received will be processed and verified in accordance with what is specifically provided for by the applicable rules, also with reference to the actual existence of the conditions for their acceptance. In the absence of such existence, the Data Controller may not follow up on the requests. The Data Controller makes every effort to respond to legitimate and well-founded requests within one month of their receipt. Depending on the complexity and number of requests, as well as what is indicated above, this deadline may be extended by two months. Upon the outcome of the management of the request and against the same, the interested party has the possibility to lodge a complaint with the supervisory authority www.garanteprivacy.it and to lodge a judicial appeal.