

## INFORMATION ON THE PROCESSING OF PERSONAL DATA (ACCORDING TO THE ARTT. 13 AND 14 OF THE UE REGULATION 2016/679)

The customer's personal data are used by SICILIAN TOURIST SERVICE S.R.L., who detains them for the processing, in compliance with the principles of protection of personal data established by the GDPR Regulation 2016/679.

Dear customer,

SICILIAN TOURIST SERVICE SRL (hereinafter "Data controller") cares for the privacy of personal data and guarantees their protection in order to prevent any possible violation.

The EU Regulation 2016/679 on data protection for all individual citizens with regard to the processing of personal data, as well as to free circulation of such data (hereinafter "Regulation" or "GDPR") establishes that the data subject (that is the individual to whom the data refer) must be informed in advance or at the most when the collection begins, about the use of the data concerning him/her. Moreover he/she must be informed that the processing of personal data is allowed only with the express consent of the interested subject except in the cases provided for by law.

As required by the Regulation, and in particular by the articles 13 and 14, here below we list the information relating to the processing of personal data required by law.

### WHO WE ARE

Identity and contact details of the Data Controller, of the Representative and of the Data protection officer (art. 13, par. 1, lett. a) and b) - art. 14, par. 1 lett. a) and b) GDPR)

SICILIAN TOURIST SERVICE S.R.L. has following address:

### DATA CONTROLLER

**Name:** SICILIAN TOURIST SERVICE S.R.L.

**Address:** Piazzetta Scannaserpe, 3 - 90146 Palermo (PA)

**e-mail:** info@stsitalia.it **Certified e-mail:** stsitalia@legal.email.it

**TEL:** +39 091 543506

SICILIAN TOURIST SERVICE S.R.L. has appointed a Responsible of the Protection of Personal Data (RPD or DPO), that is Mr. Santo Scibetta, who has following address:

### RESPONSIBLE OF THE PROTECTION OF PERSONAL DATA

**Name:** Dott. Santo Scibetta

**e-mail:** studioscibetta@gmail.com **PEC:** scibetta@pec.aruba.it

**Tel.:** +39 0922 872224 **Mobile:** 334 6343177

The list of the Data protection officers (if appointed) is available at the above mentioned address

### WHICH DATA DO WE PROCESS

Category of processed data (art. 14, par. 1, let. d) GDPR)

Source of personal data (art. 14, par. 2, let. d) GDPR)

We treat the following data categories regarding the data subject:

DATA CATEGORIES	EXEMPLIFICATION OF DATA TYPES	DATA SOURCE
PERSONAL DATA	Name, surname, gender, place and/or date of birth, citizenship, company name, private address, no. of ID	Direct acquisition from the subject or third parts
CONTACT DATA	Private telephone num., business telephone num., e-mail, certified e-mail	Direct acquisition from the subject
FISCAL DATA	tax code and VAT number	Direct acquisition from the subject or third parts

### WHY DO WE NEED THE PERSONAL DATA OF THE DATA SUBJECT

Purpose of the processing and juridical basis (art. 13, par. 1, let. c) and d) - art. 14, par. 1, let. c) - art. 14, par. 2, let. b) GDPR)

What happens if you refuse to produce your data (art. 13, par. 2, let. e) GDPR)

The Data Controller needs the data for the following purposes:

PURPOSES	DESCRIPTION	WHAT HAPPENS IF YOU REFUSE TO PRODUCE YOUR DATA
ACTIVITIES RELATED AND AIMED TO THE MANAGEMENT OF THE RELATION WITH THE CUSTOMERS	The processing of the personal data of the data subject aims to acquire information prior the pre-contractual and contractual stages	Total or partial impossibility to provide the services
EXECUTION OF THE CONTRACT SIGNED BY THE CUSTOMER	The processing of the personal data of the data subject may be aimed at: - Arranging a package trip - Facilitating the purchase of connected tourist services - Brokerage activities for the purchase of package trips arranged by third parts, or of single services provided by third parts (i.e. hoteliers, carriers etc.) - Brokerage activities for the purchase of accessory financial/insurance services linked to the package trip/tourist services or individually purchased (policies: medical, luggage, cancellation; assistance to passengers with difficulties; consumer credit loans) - Fulfilling the procedure related to the issue of visa - Attending to all the activities strictly related to the execution of the contract signed wit STS	Total or partial impossibility to provide the services
COMPLIANCE WITH LEGAL OBLIGATIONS	The processing of the personal data of the data subject is connected to the following activities: Money laundering and anti-terrorism controls; executing legal obligations, regulations, national, international and Community legislation; regulations deriving from provisions issued by Authorities, that is legitimized by the law; litigation management, protection of contractual rights - Ascertain, exercise and/or defend STS's rights in litigation, also judiciary - Fulfill obligations connected to travelers' safety and health regulations - Fulfill obligations connected to passenger and freight transport	Total or partial impossibility to provide the services

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PURPOSES	DESCRIPTION	WHAT HAPPENS IF YOU REFUSE TO PRODUCE YOUR DATA
<b>CUSTOMER MANAGEMENT AND ADMINISTRATION</b>	The processing of the personal data of the data subject consists of recording, processing and archiving of the customer's collected data, as well as fulfilling of the obligations deriving from the service provided (for example keeping the accounts, fulfilling the obligations required by law, regulations, Community legislation, civil and tax regulations, etc.)	Total or partial impossibility to provide the services
<b>ACCOUNTING AND TAX COMPLIANCE</b>	The processing of the personal data of the data subject also has the purpose of fulfilling the obligations imposed by the accounting and tax regulations, which persist even after the end of the relevant project	Total or partial impossibility to provide the services

- Public and private subjects to which STS possibly entrusts various professional assignments
- Banks;
- Subjects who file documents and services for the management of the information service;
- Subjects who are entitled to have access to your data due to legal provisions or secondary provisions, or who are authorized by the Authorities, such as airport and port authorities, customs and border authorities;
- Other public authorities in compliance with legal obligations;
- Other public bodies

If the data of the data subject are communicated to third parts or to the Responsible of the Protection of Personal Data, the Data Controller will require compliance with adequate technical and organizational measures; the processing will be limited to the data necessary for the execution of the requested service.

The data controller does not transfer the data of the data subject to third countries or international organizations. Should this be necessary, for technical or operational reasons, the Data Controller will make sure to transfer the data of the data subject to countries of the European Union or to countries outside the European Union or international organizations which are deemed "adequate" by the European Commission, or on the basis of adequate guarantees provided by the country where the data is to be transferred, or based on the specific exceptions provided for in the Regulation.

Moreover, if you expressly agree, your personal data will be treated with the purpose of information, marketing and market survey, and specifically:

Promotion and sale of the products and the services provided by the company or third parts, similar to those which are object of the pending commercial relationship with SICILIAN TOURIST SERVICE S.R.L. (which will be implemented through the sending of advertising, telephone or mail communications, and also through automatic communication systems such as sms, e-mail, fax).

ACCEPT

DO NOT ACCEPT

Consumer satisfaction degree detection or sending of surveys on the quality and type of the services and the activities; processing of studies and market surveys (sometimes through interviews, both in person or on the phone, publication and sending of surveys); execution of public relations' activities

ACCEPT

DO NOT ACCEPT

### TO WHO DO WE COMMUNICATE THE DATA

Communication to third parts and categories of recipients (art. 13, par. 1, let. e) and f) – art. 14, par. 1, let. e) and f) GDPR)

The data of the data subject are communicated to third parts mainly to carry out the activities related to the established relationship and/or to respect legal obligations. In particular data are communicated to the following recipients:

#### CATEGORIES OF RECIPIENTS

- To the suppliers of the company, and specifically to the suppliers of the tourist services included in or connected to the travel packages, or of the single services bought from STS;
- To the insurance companies who provide insurance coverage, both extra and included in the travel package bought by the customer;
- People, companies or agencies who supply marketing and survey activities for STS;
- Goods and services' suppliers;
- Freelancers;
- Professional practices or companies, within consulting and assistance activities;

### HOW DO WE PROCESS THE DATA AND FOR HOW LONG

Data retention period (art. 13, par.2, let. a) – art. 14, par. 2, let. a) GDPR)

Data processing, based on fundamental principles, can be carried out also through automated ways to store, manage and transmit them and will take place using suitable tools, according to reason and the state of the art, to guarantee security and confidentiality through the use of appropriate procedures that avoid the risk of loss, unauthorized access, illegal use and dissemination. The data are collected, processed, communicated and stored both on paper and with electronic tools in accordance with the safety standards imposed by law. They are protected through technical and organizational measures, constantly monitored and updated, suitable to guarantee the safety and protection of the personal data.

The processing is carried out by means of the operations indicated in art. 4 point 2) of the "Regulations" and precisely: collection, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction. The data of the data subject are kept in paper, computer and telematic archives located in countries where the Regulation is applied.

Unless the data subject explicitly expresses his will to remove them, the personal data referring to him will be kept until they are necessary for the legitimate purposes for which they were collected and precisely:

PURPOSE	PERIOD OF RETENTION
<b>PROFILING AND MARKETING</b>	We will store your data for a period of 5 years. We inform you that in some circumstances you have the right to ask us to delete the data.
<b>ACCOUNTING AND TAX PURPOSES</b>	Tax purposes - The data are stored until the assessments relating to single tax periods are defined, or until the relevant power decays. Accounting purposes - Data are kept for 10 (ten) years from the date of the last accounting record



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If the customer submits personal data which are not required or not necessary for the execution of the contract, "SICILIAN TOURIST SERVICE S.R.L." cannot be considered Data Controller of them and will delete them as soon as possible.

Regardless of the determination of the data subject to remove them, personal data will in any case be kept for the fulfillment of the obligations (eg. tax and accounting), which remain even after termination of the contract (article 2220 of the civil code); for these purposes, the Data Controller will only retain the relevant data.

If it becomes necessary to claim the rights descending from the contract and / or registration in court, the data of the data subject and specifically those necessary for these purposes, will be processed for the time necessary.

### THE RIGHTS OF THE DATA SUBJECT

**Data retention period (art. 13, par.2, let. b), c), d) e f) – art. 14, par. 2, let. c), d), e) e g) GDPR)**

The data subject may exercise the rights foreseen by the Regulation and listed below at any time, by sending a specific request in one of the following ways:

METHOD	ADDRESS
<b>E-MAIL</b>	info@stsitalia.it
<b>CERTIFIED E-MAIL:</b>	stsitalia@legal.email.it
<b>ADDRESS:</b>	P.tta Scannaserpe, 3 - 90146 Palermo (PA)

In the same way, the right to withdraw consent can be exercised.

Any communication and action undertaken by the Data Controller to allow the exercise of the aforementioned rights, will be free of charge. However, if the requests of the data subject are clearly groundless or excessive, especially due to their repetitive nature, the Data Controller may charge a fee, to cover the administrative costs, or refuse to satisfy the requests.

The data subject may exercise the following rights:

#### Access rights

The Data Subject can ask the Data Controller if his/her data are or not being processed. If the answer is positive, the Data Subject has the right to access his / her data and the following information:

1. the purposes of the processing;
2. the categories of the relevant personal data;
3. the recipients or categories of recipients to whom the personal data have been or will be communicated, especially if recipients of third countries or International organizations;
4. if possible, the retention period of the provided personal data or, if this is not possible, the criteria used to determine this period;
5. the existence of the data subject's right to ask the data controller for the correction or cancellation of the personal data or the limitation of the processing of the personal data concerning him/her or to oppose to their processing;
6. the right to file a complaint with a supervisory authority;
7. if the data are not collected from the data subject, all information available on their origin;
8. the existence of an automated decision-making process, including profiling, and, at least in such cases, significant information on the logic used, as well as the importance and the expected consequences of such processing for the data subject.
9. the appropriate guarantees provided by the third country (outside the EU) or the international organization to protect any data transferred

#### Right of correction

The Data Subject has the right to obtain the correction of inaccurate personal data from the Data Controller without undue delay.

#### Right of cancellation

The Data Subject has the right to obtain the cancellation of his / her personal data from the Data Controller without undue delay, if the reasons exist

according to GDPR art. 17, for example if the data processing is no longer necessary, or if the data processing is considered illicit, or if there is no legitimate reason for the processing. The Data Controller is not allowed to cancel the personal data if processing is necessary, for example, for compliance of a legal obligation, for reasons of public interest, for the assessment, the exercise or defense of a right in court.

#### Right to limit the processing

The Data Subject has the right to obtain from the Data Controller the limitation of processing, in the cases listed in art. 18 of the GDPR, for example if the accuracy has been put into doubt, for the period necessary to the Owner to verify their accuracy. The Data Subject must be informed, in reasonable time, when the suspension period has been completed or the cause of the limitation of the processing has ceased, and therefore the limitation has been revoked.

#### Right to data portability

The Data Subject has the right to receive his / her data in a structured, commonly used format and the right to transmit such data to another Data Controller without hindrance by the Data Controller to which he supplied them, in the cases listed in art. 20 of the GDPR, and the right to obtain direct data transmission of the personal data from one Data Controller to another, if technically feasible.

#### Right of opposition

For reasons related to the particular situation of the Data Subject, the latter can oppose the processing of his / her personal data at any time, if the request is based on legitimate interest (including profiling) or if it aims to commercial promotion activities. The Data Subject has the right to the cancellation of the personal data if there is no legitimate reason of the Data Controller prevailing on the one that gave rise to the request, and in any case if the Data Subject has opposed the processing for business promotion activities.

#### Right to file a complaint with the Data Protection Authority

Without prejudice to any other administrative or judicial action, the Data Subject can submit a complaint to the relevant control authority in the Italian territory (Autorità Garante per la Protezione dei Dati Personali - Authority for the protection of personal data) or to the authority acting and exercising its powers in the Member State where the violation of the GDPR has occurred.

#### Automated decision-making related to individuals, including the profiling

The Data Controller does not in any way use automated decision-making processes that concern the personal data of the Data Subject.

DATA CONTROLLER  
SICILIAN TOURIST SERVICE S.R.L.

### CONSENT TO THE PROCESSING OF PERSONAL DATA

Having read the information, and having acquired the information provided by the Data Controller pursuant to articles 13 and 14 of the EU Regulation n. 2016/679, I am fully aware of the characteristics of the processing of my data and of the purposes for which it is carried out. I have acknowledged the rights listed in the present information, and therefore the undersigned, ON BEHALF OF THE DATA SUBJECT, declares to CONSENT to the processing of the personal data.

\_\_\_\_\_, date \_\_\_\_\_  
Legible signature