

PRIVACY POLICY ACI BLUETEAM

Policy for the processing of personal data

(Pursuant to European Regulation No. 679/2016 and Legislative Decree. 196/03 and subsequent amendments and additions)

For purposes of the execution of relations with its users and customers, ACI blueteam S.p.A. collects data related to these subjects, qualified as "personal data" by the EU Regulation 2016/679. First and foremost, the legislation stipulates that those who process personal data are required to inform the data subject about what data is being processed and certain qualifying elements of the processing, which, in any case, must be carried out with fairness, lawfulness and transparency, protecting the confidentiality and rights. Therefore, according to the provisions of Article 13 of the EU Regulation 2016/679 we provide the following information:

Data Controller and Data Protection Officer

The data controller of personal data is ACI blueteam S.p.A., located in Luisago (CO), Via Risorgimento, 70, Italy. The Company has appointed a Data Protection Officer who supports the Data Controller with regard to the application of national and European data protection regulations, cooperating with the Supervisory Authority and serving as a point of contact with data subjects. The Data Protection Officer can be reached at: privacy@aciblueteam.it.

Nature of processed data

- The Data Controller will process the following type of personal data of data subjects (including minors):
- Biographical data (first name, last name, address, date and place of birth, country, and social security number),
- Contact information (telephone and email),
- Identification documents (passport, ID card, etc.),
- Security data (e.g., password for account creation),
- Payment data,
- Travel-related data,
- Data belonging to the special categories (e.g.: related to food intolerances),
- Data related to any travel companions.

Purpose of processing and legal basis

The data collected will be processed for the following purposes:

- Provide feedback to requests submitted by users/customers via the form or emails available on the ACI Blueteam website,
- Request a quote on an agency service and book the trip,
- Propose to the interested party commercial offers on products, newsletter services or other content from the company ACI Blueteam S.p.A.,
- Collect and store information about the User's device when interacting with the Website, through the use of Cookies and/or tracking tools to provide services to improve or measure the web experience, etc.

The purpose referred to in (a) and (b) can be found in the execution of a contract to which the data subject is a party, or the execution of pre-contractual measures taken upon request of the user.

The purpose of (c) can be found on the basis of the explicit consent given by the data subject. Technical (and equivalent) cookies under (d) do not require the acquisition of consent (Art. 122 of the Italian Personal Data Protection Code). Cookies and other tracking tools used for purposes other than technical purposes (e.g.:

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Administrative headquarters: Via Risorgimento, 70 - Luisago (CO) 22070 Italy - Tel: 031 9090711 - Email: info@aciblueteam.it

Certified email: aciblueteam@pec.it **V.A.T./Social Security Number:** 12593590156 - **Business Register:** Rome n°12593590156

Recipient code: MJEGRSK **REA** RM-1603827 – **Paid-up common equity capital** €700,000

profiling, analyzing and monitoring the behavior of website visitors, etc.) may be used only after obtaining the user's consent.

ACI Blueteam may send commercial communications regarding products and/or services similar to those already provided to the subjects (so-called "soft spam"), pursuant to Art. 130, paragraph 4 of the Italian Legislative Decree 196/2003, using the email information provided by the subject, to which you may object in the manner indicated in the "Rights of the data subject" section of this information notice. In such a case, the Company will discontinue the said activity without delay. The legal basis for this type of processing can be found in the legitimate interest of the Data Controller.

Method of processing and storage time

The processing of data is carried out through the use of appropriate tools and procedures to ensure their security and confidentiality and may be carried out through the use of electronic means. No automated decision-making processes are used.

Data will be processed throughout the duration of the relationship and also thereafter, for the fulfillment of legal obligations and for administrative purposes and within the limit of 10 years, unless used for additional periods at the request of judicial and other public authorities or to enforce our rights.

In regard to the quotation request, the data will be processed for the time strictly necessary to execute said request; if no contract is established, the data will be deleted within 3 months from the request.

Regarding the purpose of (d), personal data will be retained until the data subject decides to revoke their consent to the reception of the newsletter and in any case no later than 24 months after the collection of the aforementioned data.

Transfer of data to a country outside the E.U.

Personal data may also be disclosed and transferred to entities operating in countries outside the European Economic Area, particularly the United States for the use of cloud services. In any case, the transfer of data will be made on the basis of satisfactory safeguards as required by the GDPR, in particular the Standard Contractual Clauses (SCCs).

Obligation or option to give data and consequences of refusal

With regard to the data that we are obliged to know in order to provide the services the data subjects have requested and to fulfill the obligations required by laws, regulations and EU legislation, or provisions issued by Authorities empowered to do so by law and by supervisory and control bodies, their failure to provide them by the user will make it impossible to establish or continue the relationship, to the extent that such data are necessary for the execution of the same.

The provision of data for the purposes referred to in c) is optional and their processing, which requires the consent of the person concerned expressed at the time of activation of the services requested and which remains valid until revocation of the same, may serve to improve the products and services. Any failure to provide the data will not affect the provision of the requested services and/or the contractual relationship.

Communication and outreach

The data collected through the site are not "disseminated" by us, by which we mean the sharing of knowledge to unspecified parties in any way, including by making them available or consulting them.

On the other hand, the Data Subject's personal data may be "communicated" (by which term is meant

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the sharing of knowledge to one or more specified parties) by us to:

- Companies that provide transportation services, hospitality, transportation rentals, activities and excursions, insurance companies, owners and operators of accommodations and, where applicable, activity providers, railroad companies or cruise lines, or companies that intermediate such services through online platforms (by way of example only: GDSs (Global Distribution System) such as Amadeus, Sabre; OTAs (online travel agency); Bed Banks (hotel data banks), and acting as Autonomous Data Controllers,
- Third-party service providers. We share personal data with third parties in connection with providing services and managing our business (e.g., for credit card payment processing, customer service, business analytics, fraud prevention, and compliance services). Said third-party service providers are required to protect the personal information we share with them and may not directly use any personal identifying information except to provide the services for which we have contracted.

Rights of the data subject

At any time, the data subject may exercise their rights, listed below, in accordance with the provisions of EU Regulation 679/2016 and applicable Italian national legislation:

Right of access: the data subject has the right to obtain confirmation as to whether or not personal data ACI blueteam S.P.A. Registered headquarters: Via Marsala, 8 - Rome (RM) 00185 Italy c/o Presidenza ACI Administrative headquarters: Via Risorgimento, 70 - Luisago (CO) 22070 Italy - Tel: +39 031 9090711 - Email: info@aciblueteam.it - Certified email: aciblueteam@pec.it V.A.T./Social Security Number: 12593590156 - Business Register: Rome n°12593590156 - Recipient code: MJEGRSK REA RM-1603827 - Paid-up common equity capital €700,000 Stock Company Company subject to the direction and coordination of Ventura SpA concerning them is being processed and if so, to obtain access to the personal data. The data subject may request access to the following information at any time: the purposes of the processing, the categories of data processed, the recipients to whom the personal data are or will be communicated, the period of data retention, the existence of rights in his or her favor, the origin of the data, and whether an automated process exists.

Right of rectification: the data subject has the right to obtain from the data controller the rectification of inaccurate personal data concerning them without undue delay. In addition, they have the right to obtain supplementation of incomplete personal data, also by providing a supplementary statement. In such a case, the data controller will be obliged to inform each recipient to whom the personal data have been transmitted about any corrections.

Right of deletion: the data subject has the right to obtain the deletion of personal data concerning them without undue delay and to request erasure. In addition, if the data have been made public, the controller will delete them and take reasonable measures, including technical measures, to inform the data controllers who are processing the personal data of the data subject's request to delete any copies of the personal data.

Right to restrict processing: if the data subject deems it appropriate, they may request the restriction of the processing of personal data concerning them and limit its processing in the future. In such a case, the data controller will notify each of the recipients to whom the personal data have been transmitted of any processing restrictions, unless this proves impossible or involves a disproportionate effort.

Right to object to processing: the data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning them.

Right to revoke consent: in the case of consent-based processing, the data subject may revoke the consent given for processing. However, such an act does not affect the validity of the processing conducted by the owner up to that point.

Right to lodge a complaint with the Supervisory Authority: where the data subject believes that the data has been processed unlawfully and violates the rules and principles on the protection of personal data, they

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have the right to apply to the Supervisory Authority (Privacy Guarantor) to lodge a complaint, according to the procedures defined by the latter.

Cookies

The Company's website uses firsthand third-party technical and profiling cookies in order to provide the User with a better and personalized browsing experience.

The Cookie Policy describes the cookies that are installed by the Website, the characteristics, and purposes of each. In addition, it is specified which cookies require the user's consent to be installed, indicating how to revoke or confirm consent.

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