

This policy is provided in compliance with Articles 13 and 14 of EU Regulation 2016/679 concerning the protection of individuals with regard to the processing of personal data, as well as the free circulation of such data (hereinafter "GDPR") to data subjects whose personal data are being processed.

This document illustrates the purposes and methods by which your personal data are processed within the context of using the following Form (the "Site"), which personal data are subject to processing, what the rights of data subjects are, and how these rights can be exercised.

1. Data Controller and Data Protection Officer

Pursuant to Article 4 of the GDPR, the data controller of your personal data referred to in this policy is Omnio Europe S.p.A. with registered office in Via Salandra 13, 00187 Rome ("Controller").

The Controller has appointed a Data Protection Officer (DPO), reachable at the following email address: info@exoconsulting.it.

2. Categories of Personal Data Processed

This policy is intended for users who request information on travel packages available on the my Visa platform (hereinafter, "Users").

The Controller will process the following common personal data of users:

- **Contact and personal data** (name, surname, email address);
- **Site usage data** (including clicks, search history, Browse history, device information, browser information, IP address, number of sessions).

3. Purposes of Processing and Legal Bases

The Controller will process Users' personal data to allow them to use the travel packages made available on the my Visa platform and, in particular, to collect the information necessary for their use.

Specifically, your personal data will be processed: a. for the **performance of a contract** to which the data subject is party or for the execution of pre-contractual measures adopted at the request of the same [Art. 6, par. 1, lett. b) of the GDPR]; b. to **comply with legal obligations** to which the Data Controller is subject [Art. 6, par. 1, lett. c) of the GDPR]; c. to **ascertain, exercise or defend rights or interests of the Controller and/or third parties in judicial and/or extrajudicial proceedings**, including the need to protect itself in the pre-litigation phase, thus in pursuit of the legitimate interest of the Controller [Art. 6, par. 1, lett. f) of the GDPR].

4. Cookies

A cookie is a small file, generally composed of letters and numbers, that is downloaded to a device when the user accesses certain websites. In general, cookies allow a website to recognize the user's device, track their navigation through different pages of a website, and identify users who visit a site again.

This site does not use profiling cookies. The Site exclusively uses **technical cookies**, which are fundamental to allow Users to navigate the Site and use its functionalities. Such cookies do not require the Users' consent, as they are indispensable to ensure the optimal functioning and improvement of the Site.

5. Processors and Recipients of Data

The Controller will share your personal data with its employees and collaborators specifically identified and instructed by written act pursuant to Article 29 of the GDPR ("Processors"), who will process them, under the authority of the Controller, exclusively for the performance of their respective work duties.

Your personal data may also be shared with third parties, possibly appointed as data processors by the Controller by written act pursuant to Article 28 of the GDPR, or, where required by applicable law, as independent data controllers.

With reference to these categories of third-party recipients, it is specified that your data may be shared with:

- other companies within the group;
- commercial partners who support the Controller in the execution and management of the stated purposes.

6. Transfer of Data Outside the EU

In pursuing the aforementioned purposes, your personal data will not be shared with recipients located outside the European Union / European Economic Area.

Should this become necessary, the Controller undertakes to ensure that the data are processed with the utmost confidentiality and in compliance with the provisions of Chapter V of the GDPR (Transfers of personal data to third countries or international organizations), therefore based on an adequacy decision of the European Commission pursuant to Article 45 of the GDPR or, in its absence, with the adoption of appropriate safeguards referred to in Article 46 of the GDPR, such as the Standard Contractual Clauses in the latest version published by the European Commission.

7. Data Retention Period

Your personal data will be stored, with logics strictly connected to their security and the resilience of the systems used for their processing, for the time strictly necessary to achieve the purposes for which they were collected. In particular, the retention and processing of your data will take place in full compliance with the principles of data minimization and storage limitation pursuant to Article 5 of the GDPR.

Furthermore, the Controller may retain your personal data for an additional period in order to comply with contractual and legal obligations applicable to it and, where necessary, to assert, exercise or defend its rights in judicial and extrajudicial proceedings, in any case for the maximum time allowed by the law pro tempore in force.

8. Rights of Data Subjects

Pursuant to current legislation, you have the following rights.

- **Access:** you have the right to access at any time the data concerning you in the Controller's possession, as well as any useful information regarding the processing carried out by the latter;
- **Rectification:** you have the right to obtain the rectification and/or correction of inaccurate data concerning you in the Controller's possession;
- **Erasure:** in specific cases, you have the right to request and obtain, without undue delay, the erasure of your data in the Controller's possession;
- **Restriction:** in specific cases, you have the right to have the processing of your data restricted;
- **Portability:** in the case of automated processing of data based on your consent or the performance of a contract, you have the right to receive, in a structured, commonly used and machine-readable format, your personal data provided to the Controller, as well as the right to transmit such data to another data controller without hindrance;
- **Objection:** you have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on the legitimate interest of the data controller, unless the Controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms;
- **Automated decision-making:** you have the right not to be subject to a decision based solely on automated processing of your data, including profiling, where such decision significantly affects you.

You can exercise your rights, in the manner referred to in Article 12 of the GDPR and within the limitations referred to in Article 23 of the GDPR, by writing to the Controller's contacts indicated in this policy or to the DPO's address: info@exoconsulting.it.

Without prejudice to any other administrative or judicial remedy, you are also guaranteed the right to lodge a complaint with the competent supervisory authority (for Italy, the Garante per la protezione dei dati personali) if you believe there is a violation of your data protection rights. Further information is available on the website <https://www.garanteprivacy.it>.