

## PRIVACY POLICY TERMS OF USE

### (EU) Regulation 2016/679 (GDPR)

#### Personal data collected from the interested party

This report (“**Report**”) is provided to inform you about the processing of your personal data.

#### 1. Identity and contact details of the data Controller

The data controller is Simonetta Bike Tours, owner of the Itinera Bike brand with registered offices in Via Madonna del Terraglio, 5 – 37129 Verona – Italy  
VAT Code: 03969700230 – Italian Tax Code: BTTSNT58A67L781P  
email: info@itinerabike.com (“**Controller**”).

#### 2. Personal data processed

The following personal data may be collected and processed in the execution of the contract:

- a) common data: i.e. name, address, telephone/email, and also payments method details;
- b) special categories of personal data (art. 9 GDPR): i.e. food intolerances or allergies, religious data (for food purposes) as well as health data (in the case sports activities).

#### 3. Purpose and legal basis of the processing

Your data will be processed for purposes related to the execution of the contract and in particular:

- a) booking and organization of the selected trip, including registration with accommodations, food, and transfer services, excursions, and ancillary services;
- b) insurance policy;
- c) legal and regulatory obligations to which the Controller is subject;
- d) newsletter;
- e) paper or digital advertising material.

The processing referred to in lett. a) is necessary for the execution of the contract, the ones mentioned in lett. b) and c) are necessary to comply with a legal obligation to which the Controller is subject. The processing referred to in letters d) and e) requires your explicit consent.

#### 4. Recipients of personal data

Your data may be communicated to:

- 1) accommodations, food, and transfer services, excursions, and ancillary services;
- 2) insurance companies; and
- 3) tax, legal and judicial advisors.

For the above subjects only the category of recipients is indicated, as it is subject to frequent updates and revisions. Therefore, You can request the updated list of recipients by contacting the Controller through the channels indicated in art. 1 of this Report.

#### 5. Data retention period

Your personal data will be kept for the period of time strictly necessary to pursue the specific purposes of the processing as per art. 3 letter from a) to c), and specifically for the time necessary to fulfil contractual obligations and, in any case, no longer than 10 years from the time of collection of your data for legal purposes for the purposes of prescription pursuant to art. 2946 of the Italian Civil Code and for any further storage obligations imposed by applicable industry regulations. With regard to the purposes referred to in letters d) and e) of the same article, your personal data will be deleted after 24 months from the time of collection.

Data belonging to special categories will be kept no more than 1 year after the conclusion of the contract.

## 6. Rights of the data subject

You can, at any time, exercise the following rights:

- a. access to personal data: obtain confirmation of whether the data concerning you are being processed and, in this case, access to the following information: the purposes, the categories of data, the recipients, the period of retention, the right to lodge a complaint with a supervisory authority, the right to request rectification or cancellation or limitation of processing or opposition to the processing itself as well as the existence of an automated decision-making process;
- b. request for rectification or cancellation of those rights or limitation of the processing that concerns you; "limitation" means the marking of data stored with the aim of limiting its processing in the future;
- c. opposition to the processing: for reasons connected to your particular situation, you can oppose the processing of data for the execution of a task of public interest or for the pursuit of a legitimate interest of the Controller;
- d. portability of the data: in the case of automated processing carried out on the basis of consent or in execution of a contract, to receive data concerning you in a structured format, commonly used and readable by an automatic device; in particular, the data will be provided by the Controller of the data in .xml format or similar;
- e. to file a complaint according to art. 77 GDPR to the competent supervisory authority based on your habitual residence, workplace or the place of violation of your rights; for Italy, the Guarantor for the protection of personal data is competent, and that Guarantor can be contacted via the contact details on the website [www.garanteprivacy.it](http://www.garanteprivacy.it).

The aforementioned rights may be exercised by sending a specific request to the Controller of the data through the contact channels indicated in art. 1 of this Report.

Requests regarding the exercise of your rights will be processed without undue delay and, in any case, within one month from the request; only in cases of particular complexity and in the number of requests can this term be extended by a further 2 (two) months.

## 7. Communication and provision of data

The communication of your data to the addressees referred to in art. 4 of this Information Notice takes place in fulfilment of a legal obligation or in fulfilment of a contractual obligation, when this is necessary for the performance of the contractual services requested by you.

The provision of your data as per art. 2 letter. a) of this Report is mandatory as it is necessary for the performance of the obligations arising from the provision of services requested and, in any case, for the fulfilment of legal obligations to which the data Controllers are subject. Therefore, your refusal to provide the data may result in the non-acceptance of the request for the provision of services, to the extent that such data is necessary for such purposes. The provision of your data for the purposes referred to in art. 3 letter d) and d) is optional and can only take place with your explicit consent.