

N47 Information to the data subject – data collection Versione 1.0 Data: 13/10/2021

Dear Data Subject,

Please find below some information that we need to bring to your attention, not only in order to comply with the relevant legal obligations, but also because ensuring transparency and fairness when dealing with data subjects is at the heart of our business.

## DATA CONTROLLER

The Data Controller for your personal data is Gadis Tourist Service Italia Srl, which is responsible for the lawful and correct use of your personal data; you may contact the company should you require any information or if you have any requests, using the following details:

### Titolare del Trattamento: Gadis Tourist Service Italia Srl

## Sede: Localita Bra, 1 - 18021 Borgomaro IM, IT Contatti e recapiti:

Tel.	01835481
E-mail	info@gadis.it
Website	www.gadis.it
PEC	git@pec.gadis.it

# DATA PROCESSOR

#### Purposes:

The user's personal data, which has been freely communicated and acquired within the context of the activities carried out by the Data Controller, will be processed lawfully and correctly for the proper management of the relationship, for the following purposes

**a.** Without the specific consent of the customer (Art. 24 letters a, b, c of the Privacy Law and Art. 6 letters b, c, f of the GDPR): - the data will be collected and used exclusively for purposes directly associated with and instrumental to the initiation and continuation of the activities carried out by Gadis Tourist Service Italia Srl for the fulfilment of all legal, accounting and tax-related obligations. The data may be transferred to third parties for processing operations.

**b**. Only on the specific and distinct consent of the customer and until the withdrawal of the same (Arts. 23 and 130 of the Privacy Law and Art. 7 of the GDPR), statistical data may be collected through social media to enable the evaluation of the effectiveness of advertising, including the actions carried out by persons visiting a website.

**c.** Only on the specific and distinct consent of the customer and until the withdrawal of the same (Arts. 23 and 130 of the Privacy Law and Art. 7 of the GDPR), statistical data may be collected through web analysis services, which enable the monitoring and analysis of traffic data and the tracking of customer behaviour

**d.** Only on the specific and distinct consent of the customer and until the withdrawal of the same (Arts. 23 and 130 of the Privacy Law and Art. 7 of the GDPR), data for marking purposes may be collected: The data provided may be processed for sending promotional and marketing communications, including newsletters and market research, through automated systems (SMS, MMS, email, push notifications) and methods of other types (mail and telephone).



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**e.** Only on the specific and distinct consent of the customer and until the withdrawal of the same (Arts. 23 and 130 of the Privacy Law and Art. 7 of the GDPR), data regarding profiling cookies may be collected. A cookie is a simple text file stored by a website server on the user's computer or mobile device. A cookie contains anonymous data, such as a unique identifier, the name of the website and some numbers and letters. Cookies enable a website to remember user preferences and create a user profile. They are used to send advertising messages that are compatible with the preferences shown by the user when navigating the web. The use of cookies must be subject to the consent of the user. Please note that if cookies are deactivated or refused, some parts of the website may be inaccessible or may not operate correctly (so-called profiling purposes).

Failure to consent to the data processing purposes set out under points b,c,d and e will not in any way affect the ability of the user to make use of the services provided by Gadis Tourist Service Italia Srl

## Methods

the data processing will be carried out using the following methods: The Data Controller processes the user's personal data, adopting the appropriate security measures designed to prevent unauthorised access to and disclosure, rectification or destruction of personal data. Processing is carried out by manual, computerised and/or telecommunication means, with organisational methods and logic strictly associated with the stated purposes. In some cases, in addition to the Data Controller, certain nominated parties involved in the organisation of the Data Controller's company may have access to data (administrative, commercial, marketing, legal and systems administration staff) along with external entities (such as suppliers of third party technical services, messenger services, hosting providers, IT companies, advertising agencies); where necessary, these parties may also be appointed as Data Processors by the Data Controller. The updated list of Data Processors can be requested at any time from the Data Controller. In particular, the user's personal data may be communicated to certain entities appointed by the Data Controller to provide services instrumental to or necessary for the fulfilment of the obligations related to the company's activities.

#### Legal basis for processing

The legal basis for processing consists of the user's consent, the fulfilment of a contractual obligation and legal provisions.

#### Location and transfer of personal data.

The data are processed at the head office of the Data Controller and in any other location in which the parties involved are located. Some personal data are shared with recipients that may be outside the European Economic Area. The Data Controller guarantees that the processing of personal data by these recipients is carried out in accordance with the Regulation. In fact, transfers may be based on a decision based on adequacy, on Standard Contractual Clauses approved by the European Commission, or on any other appropriate legal basis. More information can be requested from the Data Controller.

In addition to this information, in order to guarantee the most correct and transparent processing of your data, please note that:

- The duration of the data processing is determined as follows:
- the time required to carry out the purposes described in this document, in line with the relevant legal requirements.
- Data processing start date: 01/01/1997
- The data subject has the right to request that the Data Controller provides access to and ensures rectification or erasure of the personal data or restriction of processing operations concerning their personal data
- The data subject may also object to the processing of their personal data if consent has been provided for one
  or more specific purposes, and has the right to withdraw such consent at any time.
- The data subject has the right to external data portability in automated form where applicable
- also has the right to complain to the following Supervisory Authority: Data Protection Authority



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The data subject has the right to the portability of his or her personal data.

Data processing is carried out by automated means that do not entail the profiling of data subjects

Borgomaro, 13/10/2021

Signature of the Data Controller Gadis Tourist Service Italia Srl