

Privacy Notice pursuant to Article 13 of Regulation (EU) 2016/679

MARKETING

We hereby inform you that, pursuant to Regulation (EU) 2016/679 (hereinafter, the "Regulation"), your Personal Data will be processed by **Neos S.p.A.**, Via Della Chiesa, 68, 21019 Somma Lombardo, Italy, acting as Data Controller (the "Controller").

The Controller may be contacted at: privacy@neosair.it

The Data Protection Officer (the "DPO") may be contacted at: DPO@neosair.it

The Controller will process the Personal Data provided by you (name, surname, e-mail address and telephone number) for the following purpose:

- **Sending newsletters and promotional communications concerning Neos products and initiatives, as well as products and initiatives of third parties offering tourism services and/or ancillary tourism services, including other companies within the Alpitour Group, by automated means (e-mail and telephone without operator intervention, such as SMS messages and push notifications). Such communications may also be aimed at conducting market research and promoting participation in prize competitions and events organized by Neos and the above-mentioned third parties.**

Please note that the Controller collects a single consent for all the marketing purposes described herein, in accordance with the General Provision of the Italian Data Protection Authority "Guidelines on Promotional Activities and Anti-Spam Measures" of 4 July 2013.

The legal basis for the above processing activity is the data subject's consent to the processing of his/her personal data (Article 6(1)(a) of the Regulation).

Provision of your Personal Data for the above purpose is optional. However, should you choose not to provide such data, the Controller will not be able to send you any communications.

Furthermore, your Personal Data will be processed for the purpose of the **automatic generation of a unique identifier upon creation of the user profile, and the association with such identifier of the information provided to the Controller and to other Group companies in the event of subsequent interactions with them, in accordance with the respective privacy notices provided by each company acting as an independent data controller.**

The identifier is used to ensure consistency, accuracy and synchronization of data where the user establishes a relationship (e.g., newsletter subscription or purchase of one or more services) with one or more companies within the Alpitour Group.

This processing is carried out on the basis of the Controller's legitimate interest. The data used solely for associating the user with a unique identifier (depending on the case: name, surname and date of birth; e-mail address; telephone number) may be accessible to other Group companies for administrative and accounting purposes pursuant to Article 6(1)(f) and Recitals 47 and 48 of the Regulation, in compliance with the data minimisation principle set out in Article 5(1)(c) of the Regulation.

Your Personal Data may be shared with:

- individuals authorised by the Controller to process Personal Data, who have entered into appropriate confidentiality obligations (e.g., employees and system administrators of Neos S.p.A.);
- third parties, some of whom act as Data Processors on behalf of the Controller (for the complete and updated list of Data Processors please contact privacy@neosair.it);
- entities, bodies or authorities to whom disclosure of your Personal Data is mandatory under applicable laws or pursuant to orders issued by competent authorities.

With regard to any transfer of Personal Data to third countries, the Controller informs you that such transfers shall take place in accordance with one of the mechanisms permitted under applicable law, including, by way of example, the data subject's consent, the performance of a contract concluded with the data subject or the implementation of pre-contractual measures requested by the data subject; the conclusion or performance of a contract entered into between the Controller and another natural or legal person in the interest of the data subject; the adoption of Standard Contractual Clauses approved by the European Commission; or the selection of recipients that participate in international data transfer frameworks or are established in countries deemed to provide an adequate level of protection by the European Commission. Further information may be obtained upon request from the Controller using the contact details provided above.

For the purposes described above, Personal Data are processed by means of IT and telematic tools according to principles strictly related to the stated purposes and, in any case, in a manner that ensures the security and confidentiality of the data, as well as compliance with applicable legal obligations.

Your Personal Data will be retained until you withdraw your consent. In any event, this is without prejudice to any further retention period required pursuant to Article 2946 of the Italian Civil Code. Additional information may be obtained from the Controller.

You have the right, at any time, to request access to your Personal Data, rectification or erasure thereof, restriction of processing, or to receive the data concerning you in a structured, commonly used and machine-readable format in the cases provided for by Article 20 of the Regulation.

You are also informed that, pursuant to Article 21 of the Regulation, you are entitled to object, on grounds relating to your particular situation, to the processing of your Personal Data. In particular, you may object at any time to the sending of direct marketing communications through automated means.

At any time, you may withdraw the consent previously given pursuant to Article 7 of the Regulation, without affecting the lawfulness of the processing carried out before such withdrawal.

In any case, you always have the right to lodge a complaint with the competent supervisory authority (the Italian Data Protection Authority), pursuant to Article 77 of the Regulation, if you believe that the processing of your Personal Data infringes applicable data protection laws.

Any request relating to the exercise of your rights should be submitted in writing to the Controller at privacy@neosair.it or to the Data Protection Officer (DPO) at DPO@neosair.it