

**Informative report about personal data processing, article 13 Legislative Decree of the 30<sup>th</sup> June 2003 No. 196.**

The legislative decree of the 30<sup>th</sup> June 2003 No. 196, “Code about personal data protection” (from now onwards called more briefly “the Code”), with the intention of regulating the right for personal data protection, provides that the party concerned (natural or juridical person, company or association which the personal data are referred to) has to receive an informative report and, when necessary, has also to give his express consent about his personal data processing.

According to the Code, personal data are considered as “any piece of information about a natural or juridical person, company or association, which are identified or identifiable directly as well as undirectly, by referring to any other piece of information, including a personal identification number”.

According to the Code, the processing is considered as “any operation or set of operations which are done also without the aid of electronic instruments and are about data gathering, registration, organization, preservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blockage, communication, diffusion, erasing and destruction, even if the data are not registered in a database”.

According to the article No. 23 of the Code (“Agreement”), the personal data processing made by private persons is allowed only with the express consent of the party concerned, which has to be given freely and with specific reference to an identified Data processing, as well as in writing documented and preceded by the informative report (article No. 13 of the Code).

According to the article No. 23 of the Code (“Agreement”), if the processing is also or only about sensitive personal data, the consent has to be given in writing, except for the cases described in the article No. 26, paragraph 4, letter “c” of the Code.

We inform you that, within the limits of the established relation(s), V.T.E. – “Villaggio Turistico Europa company limited by shares”, represented by his lawyer (from now onwards called “Persons in charge of the data processing”) – does the processing of the data given directly or through a third party or acquired during professional services. The data processing, by consent in writing received and excluding the exemptions provided for by law, can regard also personal data (sensitive personal data and judicial data).

**A) AIM OF THE DATA PROCESSING**

Personal data processing is made in the ambit of the normal activity of the persons in charge of the data processing, according to the following aims:

- I. aims which are closely related and/or necessary to carry out professional tasks and to manage working relations with costumers and third parties; these aims are necessary for the persons in charge of the data processing to carry out their professional activities;
- II. aims which are related to obligations provided for by laws, regulations and EU regulations;
- III. aims which are necessary for the persons in charge of the data processing to carry out their professional activities; for these aims the party concerned sometimes has the right to give his consent.

This category includes the following activities:

1. surveying the customers’ level of satisfaction about the service quality;
2. preservation in filing of data and documents which are necessary and related to tasks given to the persons in charge of the data processing, for a period of time following the achievement of aims which data and documents were collected and processed for, and more precisely for a period of ten years;
3. sending per letter, phone, fax and e-mail of material, mainly about fiscal or juridical matters, strictly pertaining to services given by the persons in charge of the data processing;
4. aims related to obligations regarding anti-recycling, according to the Ministerial Decree No. 141/2006:
  - a. customers’ identification;
  - b. registration of the data in archives;

- c. signalling of suspicious operations to the "UIC".

**B) DATA PROCESSING MODALITIES – SECURITY AND PRIVACY STANDARDS**

According to these aims, the personal data processing is made using manual, information and telecommunication instruments, following regulations in force and obligations regarding privacy and professional secrecy. Using these means, personal data can be collected, registered, organized, kept, consulted, processed, modified, selected, drawn out, compared, used, interconnected, communicated, erased, destroyed, released, according to regulations in force and observing every precautionary mean which guarantee security and privacy of personal data. Personal data are processed by professional men, who are considered responsible and/or representative, internal and external, as well as office collaborators, trainees and secretaries who can process personal data, in order to make fees and notes of fees as well.

The data processing is made within the limits of the above-mentioned aims and in such a way as to guarantee the security and privacy of the data; the data are processed and protected in places where the access is constantly under control. In particular, information systems and programmes are made in such a way as to limit to the strictly necessary (and within the limits of the above-mentioned aims) the personal data processing, using identification data of the people in charge of the data processing and according to predefined authorization forms. Personal, common, sensitive personal data and judicial data are collected into databases and archives. Personal data are protected and controlled in such a way as to limit the risk of destruction or loss, not authorized access or not allowed/not in compliance with the above-mentioned aims processing of the data.

Regarding the aims listed under letter B), the data processing can also regard judicial and sensitive personal data.

**C) COMPULSORY OR FACULTATIVE NATURE OF THE DATA COMMUNICATING AND CONSEQUENCES OF A POSSIBLE REFUSAL**

Regarding the above-mentioned aims, we inform you that the communicating of the data: is facultative for the processings connected and necessary to manage and execute relations with customers listed under point I. A refusal to communicate them could stop the establishment or the continuation of the contractual relation; it is compulsory for processings related to obligations provided for by laws, regulations and the EU regulations (points II and IV). A refusal to their accomplishment stop the establishment of every possible relation; it is facultative for processings listed under point III. A refusal to communicate them is not prejudicial to the improvement or the continuation of the contractual relation.

**D) SUBJECTS AND CATEGORIES OF SUBJECTS WHO THE DATA CAN BE COMMUNICATED TO**

The data can be communicated to other public and/or private subjects, to competent judicial authorities and to subjects in the same seats who are in charge of data collecting and/or processing. Moreover, personal data are communicated to other subjects whose intervention is strictly necessary to execute the contractual relation and does not imply an autonomous processing, such as the "Società Poste Italiane S.p.a." (Italian Post Offices), to send invoices or other pieces of information, credit institutions which the persons in charge of the data processing have relations or can have relations for the debit and credit transfer arrangements with, insurance companies, companies for the recovering of debts, survey companies, consulting and filing firms (also optics firms) etc.

**E) PROCESSING OF THE INTERNET NAVIGATION DATA**

*Navigation data*

During their ordinary operation, information systems and softwares used for this website get some personal data whose communication is implicit when Internet communication records are used.

These pieces of information are collected in order to be associated to identified parties concerned who, because of their nature, could enable the identification of the customers by processings and associating data of third parties.

In this data category are included IP-addresses and domain names of computers used by people who connect their computers to the website, as well as uniform resource identifiers of the requested resources, the request time, the procedure used to let the request to the server, the dimension of the file obtained as an answer, the number code which indicates the state of the answer given by the server (successful, error, etc.) and other input data regarding the operating system and the environment of the user.

These data are used exclusively to get anonymous statistic pieces of information about the use of the website and to control his correct functioning, and are immediately cancelled after the processing procedure. Data could be used to control responsibilities in case of information crimes which cause damage to the website: except for this case, the data about the web contacts do not persist for more than seven days.

#### Data given willingly by users

When e-mails are sent willingly, in a facultative and explicit way, to e-mail addresses indicated on this website, the e-mail address of the sender is acquired in order to answer to requests, as well as other personal data in the e-mail.

Specific informative reports will be progressively put or visualized on the website pages prepared for particular services on demand.

#### Cookies

No personal data about the users will be acquired by the website about it.

Cookies are not used to communicate personal pieces of information; no persistent cookies are used (systems used to trace out users).

The use of so-called session cookies (which are not persistently saved on the computer of the user and vanish when the browser is closed) is strictly limited to communicate session identifiers (made up by casual numbers generated by the server), which are necessary to allow a safe and efficient navigation on the website.

The so-called session cookies used in this website made it not necessary to use other information techniques which could prejudice the users' privacy during the navigation and do not allow to acquire personal data which identify users.

### F) **PERSONS IN CHARGE OF AND PERSONS RESPONSIBLE FOR THE DATA PROCESSING**

Regarding data processed directly by our firm, we inform you that:

Persons in charge of the data processing are:

V.T.E. – "Villaggio Turistico Europa S.p.A."

Represented by Cesarina Ballaben

34170 Gorizia (GO) Italia

Tel: +39 0431 80877

E-Mail: info@villaggioeuropa.com

The party concerned can apply to the above-mentioned addresses.

We inform you that the persons responsible for the data processing are employees of the firm as well as other subjects.

### G) **PARTY CONCERNED RIGHTS**

The person whose the data are referred to can exercise his rights according to article 7 of the Code. The mentioned rights are following:

1. The party concerned has the right to receive confirmation about the existence of personal data about him, even if they are not yet registered; those data should be communicated clearly.

2. The party concerned has the right to be informed about:
  - a) origin of the personal data;
  - b) aims and modalities of the data processing;
  - c) applied logic, when the processing is made by using electronic instruments;
  - d) address etc. of the person in charge, of the persons responsible and of the representative, according to article 5, paragraph 2;
  - e) subjects or categories of subjects who the data can be communicated to or who can get to know them as representative in the State territory or as persons responsible or in charge;
3. The party concerned has the right to get:
  - a) the updating, correction or, if the party concerned is interested, the data integration;
  - b) the cancellation, the transformation in an anonymous way or the blockage of the data processed not in accordance with the law, including data whose filing is not necessary in relation to the aims which the data had been collected or processed afterwards for;
  - c) a certificate which states that the operations listed under a) and b) have been communicated, also regarding their content, to the persons who the data were communicated or released to, except when it is impossible to do so or it would involve a use of means out of proportion to the right safeguarded.
4. The party concerned has the right to oppose completely or in part:
  - a) for reasons which are legitimate regarding the personal data processing about him, even if they are related to the filing aim;
  - b) to the processing of personal data about him, data which are collected and processed in order to send him advertising material, for direct selling or in order to do market surveys or commercial communications.

To exercise the above-mentioned rights, the party concerned can delegate, in writing, natural persons, companies, associations or organizations and can turn to legal aid.

When, according to the request mentioned in the article 7, paragraphs 1 and 2, letters a), b), c), the existence of data about the party concerned is not confirmed, you can demand a contribution for the expenses which cannot exceed the actual costs for that particular survey. However, the contribution cannot exceed the amount fixed by the Warranter Authority with general measures.

According to the article 52 of the Legislative Decree 196/03, the party concerned has the right to demand – according to modalities and prescribed times indicated in that regulation – that, for legitimate reasons, personal particulars and other personal data are not indicated, supposing the sentence or another jurisdictional measure is communicated.

When the consent for the personal data processing is given, this informative report will be considered effective also for the positions which were opened before the date when the consent was given.