

# Gattinoni Travel Network S.r.l.

VIA STATUTO, 2  
20121 MILANO (MI)  
P.IVA 02713750137  
PEC: risorseumane.gtn@pec.gattinoni.it



## Privacy Policy concerning the processing of personal data pursuant to articles 13-14 of (EU) Regulation 2016/679

**Data subject: customers.**

Gattinoni Travel Network S.r.l. in its capacity of Data Controller with regard to the processing of your personal data pursuant to (EU) Reg. 2016/679 (hereinafter the 'GDPR'), hereby informs you that the said regulation protects data subjects with regard to the processing of their personal data and that the said processing will take place in a fair, lawful, transparent manner which protects your privacy and your rights.

Your personal data will be processed in accordance with the terms of the above legal provisions and the confidentiality obligations contained therein.

Purposes and legal basis of processing: specifically, your data will be processed for the following purposes, relating to the fulfilment of legal obligations:

- Managing of controversy;
- legal compliance with regard to taxation and accounting;
- Current legal requirements.

Your data will also be processed for the following purposes relative to the performance of measures connected to contractual or preliminary obligations:

- After sales support;
- Artistic and cultural activities;
- Booking and ticketing services;
- Historical filing system of customer invoices;
- Clients management;
- Report management during sales operations;
- Marketing and Advertising;
- Quality Management;
- Sale of Nitto ATP Final tickets through a special portal with a joint controllers agreement with FIT (Italian Tennis Federation);
- Activities schedule;
- Tourist and leisure activities;
- Vendita servizi aggiuntivi su richiesta per tamponi Covid19.

For the purposes of the aforesaid processing, the Data Controller may obtain knowledge of special categories of data, as follows: General special categories of personal data, racial or ethnic origins, health conditions. Personal data in these special categories are processed in compliance with art. 9 of the GDPR.

For the purposes of the aforesaid processing, the Data Controller may obtain knowledge of personal data relating to criminal convictions or offences pursuant to art. 10 of the GDPR and in particular: General personal data relating to criminal convictions and offences, information concerning judicial measures..

Further to your consent, your personal data may be used for the following purposes:

- Marketing, including periodic newsletters with marketing, information and regulatory updating contents.;
- Profiling for marketing purposes in order to create a customer profile through the collected data aimed at personalizing commercial offers. Consent can be revoked at any time pursuant to Article 7 paragraph 3 of the GDPR;
- Transfer of personal data to third parties (Gattinoni & Co.) for marketing purposes.

Your contribution of data is optional with regard to the abovementioned purpose, and any refusal of consent will not affect the continuation of the relationship or the congruency of the processing.

Processing procedures. Your personal data may be processed by the following ways:

- using electronic calculators running softwares managed by third parties;
- Using electronic calculators running self-managed softwares or directly engineered;
- Creation of profiles concerning clients, suppliers and consumers;
- collecting data by computer or on Internet.;
- data collection in public places or places open to the public;
- Manual personal data processing with paper filing system;
- contract data processing by third parties;
- computer processing.

All data are processed in compliance with the procedures specified in articles 6 and 32 of the GDPR and with the adoption of the appropriate security measures required.

Your data will only be processed by staff specifically authorised by the Data Controller, and specifically by the following categories of staff:

- Administration office;
- Business Travel Center;
- Commercial Office;
- DPACK Office;
- GTE Office;
- HR Department;
- IT Department;
- Marketing office;
- Programmers and Analysts;
- Selected Office;
- Travel Agencies.

Disclosure. Your data may be disclosed to external entities for the correct management of the relationship and specifically for the following categories of Recipients, including all the duly designated Data Processors:

- banks and lenders;
- consultant and freelance professionals, also working as firms;
- pension and welfare institutions;
- Public/private subjects whose data transmission is mandatory or necessary in compliance with regulations or functional to the relationship management;
- Freight Forwarders and Logistics Companies;
- I dati saranno comunicati (laddove previsto dal contratto) a società specializzate per l'esecuzione di tamponi covid19, Gattinoni e le Agenzie del suo network non verranno mai a conoscenza degli esiti degli stessi.;
- sub-contractors.

Distribution: Your personal data will not be distributed in any way.

Your personal data may also be transferred, only for the aforesaid purposes, to the following countries:

- EU countries: the transfer is cross-border, therefore intra-EU to servers such as Travel Compositor hosted in Spain or Microsoft 365 servers hosted in European datacenters.;
- Non-EU States in case of travels, pursuant to Article 49 of the GDPR.

Data Storage Period. In accordance with the principles of lawfulness, limitation of purpose and minimisation of data, pursuant to art. 5 of the GDPR, the data storage period for your personal data is:

- 5 - 10 years pursuant to art. 2948 of the Italian Civil Code which provides for a 5-year prescription for periodic payments; art. 2220 of the Italian Civil Code which provides for the retention of accounting records for 10 years; art. 22 of the Presidential Decree 600 of 29 September 1973.;
- In compliance with the terms prescribed by law for the type of activity and in any case until the withdrawal of consent or until the exercise of the right of opposition pursuant to the Provv. general of 05/15/13; art. 21 EU Reg. 2016/679.;
- set for a timing not larger than the one which implies its purpose achievement, given the aim to collect data, and collected and processed for the execution and fulfillment of contract purposes;
- set for a timing not larger than the supplied services fulfillment;
- Until the duration of the Session. Legitimate interest art. 6 lett. f) and recital 47: the processing is necessary for the pursuit of the legitimate interest of the data controller or of third parties, provided that the interests or fundamental rights and freedoms of the data subject that require the protection of personal data do not prevail, taking into account the reasonable expectations nurtured by the data subject based on his relationship with the data controller. Activities strictly necessary for the operation of the site and the provision of the navigation service on the platform.

Data Controller 1: the Data Controller, as defined by the Law, is Gattinoni Travel Network S.r.l. (VIA STATUTO, 2 , 20121 MILANO (MI); VAT no.: 02713750137; contactable as follows: E-mail: [privacy@gattinoni.it](mailto:privacy@gattinoni.it)) in the person of FRANCO GATTINONI.

Data Controller 2: the Joint Data Controller, as defined by the Law, is the Italian Tennis Federation (Olympic Stadium - Curva Nord - Entrance 44 Scala G, 00135 Rome; VAT number: 01379601006; contacted at the following addresses: E-mail: [dpo@pec.federtennis.it](mailto:dpo@pec.federtennis.it)) in the person of its pro tempore legal representative.

The Data Protection Officer (DPO) designated by the Data Controller pursuant to art. 37 of the GDPR is:

- JAERA S.R.L. - Dott. Alessandro Simonassi (Piazza Della Repubblica 32 , 20124 Milano (MI); VAT no.: 10557200960; contactable as follows: E-mail: [dpo@gattinoni.it](mailto:dpo@gattinoni.it)).

You are entitled, by application to the Data Processor, to obtain the erasure (right to be forgotten), restriction, updating, rectification and portability of your personal data, to object to their processing, and in general to exercise all your rights under articles 15, 16, 17, 18, 19, 20, 21 and 22 of the GDPR.

You may also examine whenever you like the updated version of the present report by connecting to the following web site <https://www.privacylab.it/informativa.php?19637433895&lang=en>.

## Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22 - Rights of the Data Subject

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her exist, regardless of their being already recorded, and disclosure of such data in intelligible form, and the right to lodge a complaint with the supervisory authority.

2. The data subject has the right to be informed of:

- a. the source of the personal data;
- b. the purposes and methods of processing;
- c. the logic applied if the data are processed by electronic devices;
- d. the identification data concerning the Data Controller, the Data Processors and the representative designated as per article 5, comma 2;
- e. the entities or categories of entity to whom or which the personal data may be disclosed and who or which may get to know said data as designated representative in the State's territory, as data processors or as persons in charge of the processing.

3. The data subject is entitled to obtain:

- a. the updating, rectification or, where interested therein, integration of the data;
- b. the erasure, anonymisation or blocking of data that have been unlawfully processed, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
- c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were disclosed or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected;
- d. the portability of the data.

4. The data subject has the right to object, in whole or in part:

- a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.

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## Data subject consent form

Data : ..... Place : .....

Name, Surname: .....

I, the undersigned data subject, having received the information supplied by the Data Controller under article 7 of (EU) Reg. 2016/679 (privacy policy statement no. 19637.51.433895.2307332):

Do you consent to the processing of your personal data for the optional purposes set out below?

**YES**    **NO**   Marketing, including periodic newsletters with marketing, information and regulatory updating contents.

**YES**    **NO**   Profiling for marketing purposes in order to create a customer profile through the collected data aimed at personalizing commercial offers. Consent can be revoked at any time pursuant to Article 7 paragraph 3 of the GDPR

**YES**    **NO**   Transfer of personal data to third parties (Gattinoni & Co.) for marketing purposes

Data subject:

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