## Trueitalian Experience S.r.l.

via Ermete Conti 7 42020 San Polo D'Enza (RE) P.IVA 02893710356



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

#### Data subject: customers.

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.

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;
- Historical filing system of customer invoices;
- · Clients management;
- Report management during sales operations;
- Marketing and Advertising;
- Quality Management;
- Activities schedule.

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;
- 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.

- Admnistration office;
- Marketing office;
- · Sales department.

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:

Printed on 23/05/2023

- banks and lenders:
- consultant and freelance professionals, also working as firms;
- 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;
- 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, and in particular: - Microsoft 365: In accordance with the Microsoft 365 Service Use Agreement, Microsoft's online services will be used to store data (onedrive for Business, sharepoint, Office 365,...), in such a situation Microsoft will store the following Company Data at rest only within the European Geographical Area: https://docs.microsoft.com/it-it/microsoft-365/enterprise/eu-data-storage-locations? view=o365-worldwide as can be seen from the document published by Microsoft itself at this link. The GEOS data center is available in Germany and France and allows you to store data in your country, if the company is located there. The data centers of the European Union are located in Austria, Finland, France, Ireland and the Netherlands.

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 civil code which provides for the prescription of 5 years for periodic payments; art. 2220 Civil Code that provides for the conservation of the accounting records for 10 years; art. 22 of the D.P.R. 29 September 1973, n.600.

Contitolare: i contitolari del trattamento dei dati, ai sensi della Legge e nella persona del loro rappresentante pro tempore, sono:

- Trueitalian Experience S.r.l. (via Ermete Conti 7, 42020 San Polo D'Enza (RE); VAT no.: 02893710356; contactable as follows: E-mail: info@trueitalianexperience.it) in the person of Maurizio Rota;
- Gattinoni Travel Network S.r.I. (Via Statuto 2, 20121 Milano (MI); VAT no.: 02713750137)

Il responsabile della protezione dei dati (DPO) designato da Trueitalian Experience S.r.l. ai sensi dell'art.37 del GDPR è:

 Jaera s.r.l. (Piazza Della Repubblica 32, 20124 Milano (MI); VAT no.: 10557200960; contactable as follows: E-mail: dpo@trueitalianexperience.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 <a href="https://www.privacylab.it/informativa.php?20824450396&lang=en">https://www.privacylab.it/informativa.php?20824450396&lang=en</a>.

### 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 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.

Printed on 23/05/2023 2

#### 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.

Printed on 23/05/2023 3