

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

The **Holiday System S.r.l.** with headquarters at via Giacomo Matteotti 1/E 38065 Mori (TN), C.F. and VAT number 01554560225, as the Data Controller, informs you, pursuant to art. 13 of Regulation (EU) 2016/679 (Regulation concerning personal data protection, hereinafter referred to as "GDPR"), regarding the essential elements of the processing operations as illustrated below.

We emphasize that our company operates in full compliance with the applicable Italian regulations on personal data protection and the GDPR, acknowledging its utmost importance. Before browsing, we invite you to carefully read this notice (hereinafter referred to as the "Notice"), as it contains important information about personal data protection and the security measures adopted to ensure confidentiality.

Additionally, this Notice:

- is provided only for the site www.intersummercamp.it ("Site") and does not apply to other websites that may be accessed via external links;
- is intended as a Notice provided pursuant to art. 13 of the GDPR to those who interact with the Site.

Here are the essential elements of the processing operations.

Personal data subject to processing

Personal data refers to any information concerning an identified or identifiable natural person, with specific reference to identifiers such as a name, identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of a natural person.

The personal data collected by the Site are as follows:

- a) Navigation data:** the Site's IT systems collect certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to identify you, but by its very nature, could, through processing and associations with data held by third parties, allow you to be identified. Data collected includes, for example, IP addresses or domain names of devices used to connect to the Site, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numeric code indicating the server's response status (success, error, etc.), and other parameters related to your operating system and IT environment;

b) Data voluntarily provided: through the Site you have the opportunity to voluntarily provide personal data, for example, your name, contact details, billing address for purchasing our products through the *online registration service* available on our Site. We will use this data in compliance with current applicable regulations, assuming it refers to you. If the data pertains to third parties, for them, you are considered an independent data controller, assuming all legal obligations and liabilities. In this regard, you provide the broadest indemnification against any dispute, claim, compensation request for damage from processing, etc., that might reach our company from third parties whose personal data has been processed through your use of the Site in violation of currently applicable regulations;

c) Cookies and similar technologies: we collect personal data through *cookies*. More information about the use of *cookies* and similar technologies is available [here](#)

d) Purposes and legal bases of processing

Specifically, your personal data is processed for the following purposes and legal bases:

- **site viewing and navigation** (these are activities related to the proper provision of the various features requested by you, for security reasons, and for ascertaining liability in case of hypothetical computer crimes against the Site, as well as to obtain anonymous statistical information on the use of the Site and to check its correct functioning); the **legal basis** of this purpose is identified in the contract and pre-contractual measures (art. 6.1, letter b, GDPR);
- activities related to contact management** (these are activities that involve the processing of personal data such as, for example, name, surname, subject; the **legal basis** of this purpose is identified in the contract and pre-contractual measures (art. 6.1, letter b, GDPR);
- activities related to the execution of a contract in which you are a party, including the pre-contractual phase** (examples of activities are: the provision of a service through the online registration section available on the Site, subscription to newsletter services, etc.); the **legal basis** of this purpose is identified in the contract and pre-contractual measures (art. 6.1, letter b, GDPR);
- research/statistical analysis on aggregated or anonymous data** (this is an activity that does not involve the processing of personal data, as it does not involve user identification and is used, for example, to measure Site performance, measure traffic, and assess interest);
- activities related to the ascertainment and/or exercise and/or defense of rights** (examples of activities are: disputes regarding the correct performance of the contractual relationship, warnings, debt recovery); the **legal basis** of this purpose is identified in the legitimate interest (art. 6.1, letter f, GDPR);
- **other activities in execution of legal obligations/authority orders** (such as communication to third parties); the **legal basis** is identified in the legal obligation (art. 6.1, letter c, GDPR);
- maintenance of IT systems and devices** (individuals tasked with performing maintenance and repairs on the Site may accidentally access your personal data. These are entirely occasional and unforeseeable events and in any case, lack identification purpose and duration is limited to the execution of the maintenance/repair intervention); the **legal basis** of this purpose is identified in the legitimate interest (art. 6.1, letter f, GDPR). We do not perform processing with automated decision-making processes.

We do not perform profiling activities, except for profiling through cookies. More information about the use of *cookies* and similar technologies is available here. Specific notices will be published on the Site pages prepared for the provision of certain services (e.g., “*online registration*” service).

Data storage times

Your personal data will be kept for the times strictly necessary to fulfill the purposes illustrated above and to comply with legal obligations. Specifically, for **site viewing and navigation** your data is immediately deleted at the end of the browsing session, unless they are necessary for the exercise or defense of rights, for **activities related to contact management** your personal data is deleted when the purpose of contact, response, or correspondence is definitively exhausted, for the **activities related to the execution of a contract you are a part of (including the pre-contractual phase)**, your personal data is kept for the entire duration of the contractual relationship and, once the relationship is concluded, will be kept for the needs of ascertainment/exercise/defense of a right, for the **activities related to the ascertainment and/or exercise and/or defense of rights**, until the time allowed by national regulations to protect your interests (arts. 2946 and 2947 c.c.), unless further conservation in case of interruption of prescription; for the **activities in execution of legal obligations/authority orders** and for **maintenance of IT systems and devices**, referring to personal data we hold for the other purposes indicated in this Notice, the storage times coincide with those identified from time to time for the aforementioned purposes.

Consent and optionality/obligation of provision.

The processing of your personal data for the purposes illustrated above may be carried out without your consent.

The provision of your data that you are contractually obligated to provide us or by legal obligation is mandatory and constitutes a necessary requirement for the conclusion of the contract, and failure to provide it will make it impossible for us to proceed with the contracts and other related obligations. Any other provision of your personal data (e.g., for sending requests not yet contractualized or for browsing the site) is merely optional. The only consequence of failing to provide is the inability to provide or perform the requested services.

Categories of recipients

Your Personal Data may also be communicated to third parties for technical and operational needs closely related to the purposes mentioned above, in particular to the following categories of subjects:

a) individuals necessary for the delivery of services offered by the Site, including for example the sending of e-mails and analysis of the Site's functioning, who typically act as data processors of our company;

- b) entities, professionals, companies, or other structures we have assigned to perform processing connected to the fulfillment of contractual, administrative, accounting, insurance, and management obligations linked to the ordinary conduct of our economic activity, also for credit recovery purposes;
- c) public authorities and administrations for purposes connected to the fulfillment of legal obligations or to parties authorized to access by law, regulations, community regulations;
- d) banks, financial institutions, or other entities to which the transfer of those data is necessary for the performance of our company's activities in relation to fulfilling the contractual obligations we have undertaken with you;
- e) suppliers of installation, assistance, and maintenance services for systems and IT and telecommunication systems and all functionally connected and necessary services for the execution of the performances covered by the contract;
- f) individuals we have authorized to process the data who have committed to confidentiality or have an adequate legal obligation of confidentiality (e.g., employees and collaborators).

International transfers

The Data Controller does not transfer personal data outside the European Economic Area. However, the Data Controller reserves the right to use cloud services; in which case, service providers will be selected among those who provide adequate guarantees in compliance with the Applicable Regulations.

Processing methods

The processing of your personal data will occur both in electronic and paper format. However, the processing will be predominantly carried out with IT tools and in any case with the observance of the minimum precautionary security and confidentiality measures for the data. In particular, technical, IT, organizational, logistical, and procedural security measures have been implemented to prevent data loss, unlawful or inappropriate use, and unauthorized access.

Rights of the data subject and complaint to the Authority

We inform you that regarding the processing of your personal data, you can exercise the following rights:

- a) **Right to access your personal data** (art. 15 GDPR): you may contact us to know whether your personal data is being processed and the legal information on the processing;
- b) **Right to rectification** (art. 16 GDPR): obtain the correction of your inaccurate personal data or the integration of incomplete data;
- c) **Right to erasure/forget** (art. 17 GDPR): obtain the deletion of your personal data, in the cases provided by law;
- d) **Right to restriction of processing** (art. 18 GDPR): obtain the submission of your personal data to storage only, excluding other activities, in the cases provided by law;

- e) **Right to data portability** (art. 20 GDPR): obtain your personal data in a structured, commonly used, and machine-readable format and, also, obtain their direct transmission to another data controller, in the cases provided by law;
- f) **Right to object** (art. 21 GDPR): right to stop further processing of personal data for reasons related to your particular situation, subject to the prevalence of our overriding legitimate reasons, in the cases provided by law;
- g) **Right to withdraw consent** (art. 7.3 GDPR): right to withdraw consent at any time for cases where processing is based on consent.

To exercise the above rights, you can use the contacts of the Data Controller provided in this Notice.

The exercise of rights is not subject to any form constraint and is free. We also inform you of your right to file a **Complaint with the competent Data Protection Authority**. Remember that the complaint, according to art. 77.1 GDPR, can be promoted by the interested party at the Authority of the place where the interested party habitually resides, works, or where the alleged violation occurred.

Data Controller

The Data Controller is: Holiday System S.r.l.

- email: gdpr@holidaysystem.it

- phone: 0464 423854

- postal mail: via Matteotti 1/E, 38065 Mori (TN)

Changes

This policy has been in effect since October 18, 2018. We reserve the right to modify or simply update its content, in whole or in part, even due to changes in the applicable legislation. The updated Notice will be promptly published on this Site. We therefore invite you to regularly visit this page to view any updates.