

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 ("GDPR")

1. Data Controller

The Data Controller is: **Scandiwalks di Ornati Pamela** – Via Gramsci 43, 00015 Monterotondo (Roma) – Italy **VAT Number:** 17697121006 | **Email:** booking@scandiwalks.com | **Certified Email (PEC):** scandiwalks@postecertifica.it | **Telephone:** +39 328 8634138

For any request concerning the processing of personal data, the Data Controller may be contacted at the contact details provided above.

2. Categories of Data Processed

Scandiwalks may process the following categories of personal data:

- identification data (name, surname, gender, date and place of birth);
- contact details (address, telephone number, e-mail);
- data contained in travel documents, when necessary for booking purposes;
- fiscal/tax data necessary for invoicing;
- booking-related data;
- information regarding travel preferences;
- payment-related data (without storing the full details of payment cards);
- any data concerning allergies, disabilities, dietary requirements, or health conditions, exclusively when voluntarily provided by the customer and strictly necessary for the performance of the trip.

3. Purposes of the Processing

Personal data are processed in order to:

- prepare quotes and estimates;
- manage bookings;

- organize tours, activities, and tourist packages;
- purchase services from suppliers;
- issue invoices and tax documentation;
- comply with obligations provided for by Italian law;
- provide assistance before, during, and after the trip;
- manage any complaints;
- protect the rights of the Data Controller.

Subject to the prior consent of the data subject, the data may also be used for:

- sending newsletters;
- promotional communications;
- commercial offers;
- marketing initiatives.

Consent may be withdrawn at any time.

4. Legal Basis for the Processing

The processing is based on:

- the performance of a contract or pre-contractual measures (Art. 6, para. 1, letter b of the GDPR);
- compliance with a legal obligation (Art. 6, para. 1, letter c of the GDPR);
- the legitimate interest of the Data Controller (Art. 6, para. 1, letter f of the GDPR);
- the consent of the data subject, where requested (Art. 6, para. 1, letter a of the GDPR).

For any special categories of personal data, Article 9 of the GDPR shall apply.

5. Processing Methods

Data are processed by means of paper and electronic tools, adopting technical and organizational measures suitable to guarantee their:

- confidentiality;
- integrity;

- availability;
- security.

The processing is carried out exclusively by authorized personnel or by entities appointed as Data Processors.

6. Communication of Data

Data may be communicated exclusively to entities necessary for the performance of the contract, including:

- hotels;
- accommodation facilities;
- airlines;
- railway companies;
- transport companies;
- tour guides;
- museums;
- archaeological sites;
- restaurants;
- insurance companies;
- banks;
- tax consultants;
- legal advisors;
- IT providers;
- public authorities, when provided for by law.

The data will not be disseminated.

7. Transfer of Personal Data to Third Countries

Within the context of the organization and performance of the tourist services requested by the customer, it may become necessary to communicate certain personal data to suppliers, commercial partners, or authorities located outside the European Economic Area (EEA).

Such entities may include, by way of example and without limitation:

- accommodation facilities;
- airlines;
- shipping/cruise companies;
- transport companies;
- local tour operators;
- tour guides;
- insurance companies;
- customs or immigration authorities;
- other suppliers directly involved in the performance of the services requested by the traveler.

The transfer of personal data shall take place exclusively to the extent strictly necessary for the performance of the travel contract and in compliance with Articles 44 et seq. of Regulation (EU) 2016/679 (GDPR).

Where the destination country has been the subject of an adequacy decision adopted by the European Commission pursuant to Article 45 of the GDPR, the transfer shall take place on the basis of such decision.

In the absence of an adequacy decision, Scandiwalks shall adopt one of the appropriate safeguards provided for by Articles 46 et seq. of the GDPR, such as, where applicable:

- Standard Contractual Clauses (SCC) approved by the European Commission;
- Binding Corporate Rules (BCR), where applicable;
- other safeguards recognized by European legislation.

Should none of the safeguards indicated above be applicable, and the transfer nevertheless remains indispensable for the performance of the contract concluded with the data subject or for the implementation of pre-contractual measures adopted at the request of the same, the transfer may take place pursuant to Article 49, paragraph 1, letter b) of the GDPR.

In particular, this hypothesis may occur when the customer requests tourist services to be provided in non-EEA countries and the communication of personal data to local suppliers constitutes an indispensable prerequisite for the booking and performance of the requested services.

Scandiwalks adopts appropriate technical and organizational measures to ensure that all international transfers take place in compliance with the principles of lawfulness, fairness, transparency, data minimization, and security provided for by the GDPR.

The data subject may request further information on the safeguards adopted for international transfers of personal data by contacting the Data Controller at the contact details indicated in this Privacy Notice.

8. Data Retention

The data will be retained:

- for the entire duration of the contractual relationship;
- subsequently, for the period provided for by tax, civil, and accounting legislation;
- for the time necessary to protect the rights of the Data Controller.

Data processed for marketing purposes will be retained until the withdrawal of consent or, in any case, for the period provided for by current legislation.

9. Online Payments

Payments made via Stripe or other electronic circuits are managed directly by the respective providers. Scandiwalks does not store or process full credit card data.

10. Cookies and Website

The Scandiwalks website uses technical cookies and, subject to the user's consent, analytical or profiling cookies in accordance with what is indicated in the Cookie Policy published on the website.

11. Rights of the Data Subject

The data subject may exercise at any time the rights provided for by Articles 15-22 of the GDPR. In particular, they have the right to:

- obtain confirmation as to the existence of the data;
- access personal data;
- request rectification;

- obtain erasure (right to be forgotten) in the cases provided for by law;
- restrict processing;
- object to processing;
- receive data in a portable format;
- withdraw consent;
- not be subject to automated decision-making, where applicable.

Requests may be sent to the following address: booking@scandiwalks.com

12. Complaint to the Supervisory Authority

The data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*) or with the competent authority of their European Union Member State.

13. Nature of the Provision of Data

The provision of data requested for the conclusion of the contract is mandatory. Any refusal to provide such data may make it impossible for Scandiwalks to provide the requested services.

14. Updates to the Notice

This Privacy Notice may be updated to adapt it to regulatory or organizational changes. The version published on the Scandiwalks website always constitutes the current version in force.