

## Information to Customers

This statement is made in accordance with art. 13 of the EU Regulation 679/2016 (From now on "GDPR") from **Holiday System S.R.L**, located in Via Matteotti 1/E, 38065 Mori (TN)C.F. and P. IVA 01554560225, in quality of the Holder of the treatment to whom accesses to our website camp.juventus.com (from now on only the "Site") and makes explicit request to purchase our services through the section *Subscribe on line* in order to illustrate the essential elements Of the treatments carried out.

### Definitions

Minor: Physical person less than 17 years old.

Parents— The Term parents generally indicates who is the owner of the parental responsibility on the Child.

Participant: Natural person That will take advantage of our services and then takes part in the summer camps organized by our Company.

Personal Information: Information identifying (directly or indirectly) a specific individual, e.g. name, postal address, e-mail address, telephone number, IP address.

Particular Categories of personal data: particular categories of data are the data suitable to reveal the racial and ethnic origin, religious, philosophical or other beliefs, political opinions, or union membership, as well as genetic data, biometric data designed to uniquely identify a natural person, data related to health or Sexual life or sexual orientation of a person.

### Our services Can be purchased through the section "*Subscribe on line*"

The services that can be purchased through the Site consist of tourist packages, in particular, camp Summer Described in their respective Regulations For Minor Participants.

### Data Personal treated

The data provided voluntarily will be processed. Through the Site, you have the opportunity to voluntarily provide Your personal data, for example, Name, surname, fiscal code, Tax data, contact details, Billing Address As well as the Minor Participant data needed for the purchase of our Services through the section "*Subscribe on line*" available on the Site. We will use this data in compliance with applicable law, assuming that they are Referred to you, as a Parent, and the Participant. In the case that the data are referable to third parties, you are autonomous owner of the treatment, assuming all the obligations and responsibilities of the law. To this effect, you confer on the point the widest indemnity with respect to any dispute, demand, claim for damages from treatment, etc. that should reach our company by third parties whose data have been processed through your use of the Site.

### The categories of personal data processed

We use your personal information as a Parent or as well as the Minor Participant data required to complete the Minor Participant's entry into the chosen tourist package and to allow us to provide all services related to the fulfillment of our contract.

These are the main Categories of data processed:

- Name, surname, fiscal code, Tax data, contact details, Parent's billing address;
- The transaction data entered when you purchase a tourist package on the Our Website, data on Method of payment;
- The Participant's identifying data;
- The Health data of the Participant Collected Also By medical Certification and the compilation of the Participant's health card And all the additional information necessary to ensure physical fitness for participation in sports activities.

### Finality and legal bases of the treatment

The data provided allow us to carry out all the activities covered by the contract, as well as carrying out all activities related to the fulfilment of our obligations, such as, for example, administrative activities tax and accountants obligations.

Specifically personal data Provided by You are treated for the following purposes And Legal bases:

- **Activities related to the execution of the contract that you are part into,**

**including the Pre-Contractual phase** (Examples of activities are: The acquisition of information prior to the conclusion of the contract, communication of requests and/or replies to requests received, management of reports for administration activities, accounting, orders, shipments, invoicing, services, The fulfilment of obligations Contractual and of law); The **Legal basis** Of the above-mentioned purpose is identified in the contract and pre-contractual measures (art. 6.1, letter B, GDPR) With regard to the processing of the data relating to the Parent and the Participant, except for the data suitable to reveal the health status of the Participant; The **Legal basis** Of the above-mentioned purpose is identified in Consent (Art. 9.2 Letter a, GDPR) With regard to the treatment of the Participant data suitable to reveal the health status of the Participant;

- **Direct Marketing Activities** (for the sole purpose of dParent's ATI) For: **1** Direct marketing activities to promote the direct sale of products or services similar to those already purchased, using traditional modes (e.g. paper mail) to the addresses communicated to us, without prejudice to the possibility of opposing and not receiving any more such communications (specifying the channel through which no longer wants to be contacted); The **Legal basis** Of the above-mentioned purpose (referred to in this paragraph 1) is identified in the legitimate interest (art. 6.1, letter F, GDPR); **2** Direct marketing activities to promote the direct sale of products or services similar to the ones already purchased, using automated modes (email, fax, SMS) to the addresses communicated to us, without prejudice to the possibility of opposing and no longer receiving such communications (specifying the channel through which no You want to be contacted more); The **Legal basis** Of the above-mentioned purpose is identified in art. 13 (2) of Directive 2002/58/EC and in art. 130, paragraph 4, of D. L.Gs. 30 June 2003, no 196 (art. 6.1, point F, GDPR);
- **Activities related to the assessment and/or exercise and/or the defence of rights** (Examples of activities are: Disputes concerning the correct fulfilment of the contractual relationship, diffide, debt recovery); The **Legal basis** Of the above-mentioned purpose is identified in the legitimate interest (art. 6.1, letter F, GDPR);
- **Keeping records** (only Parents' data); The **Legal basis** is identified in the statutory obligation (art. 6.1, letter C, GDPR);
- **Other activities running obligation to law/order Authority** (e.g. communication to third parties); The **Legal basis** It is identified in the statutory obligation (art. 6.1, letter C, GDPR);
- **Maintenance of computer systems and devices** (persons charged with maintenance and repairs on the Site may accidentally have access to your data l (as well as the Participant data). These events are entirely occasional and unpredictable and in any case devoid of the purpose of identification and duration limited to the execution of maintenance/repairs); The **Legal phase** Of the above-mentioned purpose is identified in Legitimate interest (art. 6.1, letter F, GDPR).

We Do not perform treatments with automated decision-making processes nor profiling.

### **Data Retention**

Your Personal Information Provided by You will be kept for the time strictly necessary to fulfill the purposes described above and to fulfil the obligations under the law.

In particular, for the **Activities related to the execution of the contract (including the Pre-Contractual phase)**, Personal data will be kept for the duration of the contractual relationship and, once the report has been concluded, will be kept for the purposes of ascertaining/exercising/defending a right and that of filing. Please Note that the data suitable to reveal the Child's health status will be cancelled at the end of the stay of each Participant. Regarding **Marketing activities (also direct)**, Personal data of the Parent Will be kept for the period of 24 months, subject to further preservation for the detection/operation/defense requirements of a right and that of storage, For the **Activities related to the assessment and/or exercise and/or the defence of rights**, Personal data Provided will be kept for 10 years, as provided for by the ordinary limitation period (art. 2946 C.C.), save further preservation in case of interruption of the prescription;

For the **Activities related to conservation By law obligation**, Your personal information Provided by You will be kept for 10 years for mandatory filing purposes *ex Lege* (Artt. 2220 C.C.; 22, paragraphs 2 and 3 D.P.R. 29.9.1973, no 600), except further preservation in the event of a termination of the prescription; For the other **Activity in running obligation to law/order Authority and to Maintenance of computer systems and devices**, referring to personal data we have for the other purposes indicated in this statement, the time of preservation coincide with those from time to time identified for the above purposes.

#### **Consent and Facoltativity/Mandatory of the conferral.**

The Treatment Of Personal information Provided by You, for the purposes Related to the execution of the contract (including the phase pre-Contractual), with the exception of data related to revealing the health status of the Minor Participant, for the purposes related to the Assessment and/or exercise and/or defense of rights, for the Keeping record As well as for other activities running obligation to law/order Authority and maintenance of computer systems and devices, Can be carried out without your consensus.

On the other hand, the data relating to revealing the state of health of the Minor Participant is subject to Your consent.

In any case the Conferral of your Data is mandatory based on(l) Contractual constraint, To Law Fulfillment and/or Regulations And It also constitutes a requirement necessary for the conclusion of the contract. The failure to confer Of your Personal information For the above-mentioned purposes Will Therefore The Impossibility, on our part, to give course to contracts and other related fulfilments. The Treatment of Your personal information For marketing purposes Can be conducted without the Consent (but you can always oppose to it);

#### **Recipient Categories of the data**

The data Personal Provided by You can be communicated to subjects For technical requirements and Closely related operating The above-mentioned purposes and In particular to the following categories of subjects:

- a) Subjects necessary for the delivery of the services offered by the Site including, but not limited to, the sending of e-mails, the service of *Subscribe on line* and analysis of the operation of the Site that typically act as data controllers;
- b) Bodies, professionals, companies or other structures which we carry out the treatment of the fulfilment of the obligations (such as, for example, sports associations, hotel structures, airlines, transport services to the host structure);
- c) Entities, professionals, companies or other structures we charge of treatments related to the Fulfilment of administrative obligations, Insurance and management related to Ordinary course of our economic activity, also for the purposes of debt recovery;
- d) To public authorities and administration For the purposes related to the Fulfillment of legal obligations or Persons entitled to access it by virtue of legal provisions, regulations, Community legislation;
- e) Banks, financial institutions or other parties to whom the transfer of such data results Necessary To the performance of Activities of Our company in relation to, the contractual obligations assumed;
- f) Service providers of installation, service and maintenance of systems and computer systems and telematics and all services functionally connected and necessary for the fulfillment the performance of the Contract;
- g) Persons authorized by US To Processing of data that is committed to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators).

Your Personal Information Provided to You to reveal the health status of the Minor Participant may be communicated to third parties for technical and operational needs Closely related to the above-mentioned purposes and, In particular, To the following categories of subjects:

- a) Entities, professionals, companies or other structures entrusted to us in the treatment of the fulfilment of the contractual obligations (such as: sports associations, hotel structures,

Doctors in charge of the stay as well as the health care staff employed at Holiday System to provide health care to sports activities, Site Management company and the online enrollment system;

- b) Service providers of installation, service and maintenance of systems and systems and telematics and all services functionally connected and necessary for the fulfilment of the performance covered by the contract;
- c) Persons authorised by us to treat the data which have committed themselves to confidentiality or have an adequate legal obligation of confidentiality (e.g. employees and collaborators).

### **Transfers abroad**

The Holder of the treatment does not transfer your personal data Outside the European Economic Area. The Proprietor, however, reserves the right to use services in *Cloud*; In which case, service providers will be selected from those who provide adequate safeguards In accordance with the applicable law.

### **Methods of treatment**

The Treatment of Your personal data will be both Electronic and Paper.

The treatment will be Mainly carried out with Computers and in any case With the observance of the minimum precautionary measures of security and confidentiality of data. In particular, technical, computer, organisational, logistical and procedural security measures have been implemented in order to prevent the loss, misuse or non-relevant use of data and access to themselves without authorization.

### **Your rights and claim to the Garante**

We inform you that about the treatment of Your personal information (together with Participant data)

You can Exercise the following rights:

- a) **Right to get the Access To Your personal information** (together with Participant data) (art. 15 GDPR): You can contact us to know if the Your personal information (together with Participant data) are the subject of treatment and the information of the treatment law;
- b) **Right to rectify** (art. 16 GDPR): Get The correction of your personal data (together with Participant data) to correct inaccurate information or integrate;
- c) **Right to Oblivion** (art. 17 GDPR): Obtaining the cancellation of Personal information (together with Participant data) in the Assumptions provided by the Law
- d) **Right to Limitation of the treatment** (art. 18 GDPR): Obtaining the subposition of your Data Personal (together with Participant data) Preservation alone, with the exclusion of other activities in the Assumptions provided by the Law
- e) **Right to Portability** (art. 20 GDPR): Obtaining your Data Personal (together with Participant data) In a structured format, commonly used and readable by automatic device and Get, also, The direct transmission to another holder of the treatment, Assumptions provided by the Law
- f) **Right to object** (art. 21 GDPR): Right to cease further processing of personal data (together with Participant data) For reasons related to the Particular situation, save prevalence of our legit interest, in the assumptions provided by the Law
- g) **Right to revoke the Consent** (art. 7.3 GDPR): Right to revoke at Any time consent For cases where The Treatment is based on consensus.

To exercise the rights You can Use the contacts of the holder provided in this statement.

The exercise of rights is not subject to any constraint of Form and it's free.

You We also inform Of your Right to promote **Complaint ahead to the Authority Sponsor** For the protection of competent personal data. That complaint, in accordance with the art. 77.1 GDPR, may be promoted by the person concerned to the Authority of the place where the person is habitually resident, where he works or where the alleged infringement has occurred.

### **Right of object for the Activities of Direct marketing**

You Remember that, at any time, you can no longer receive communications (specifying the channel through which they no longer wish to be contacted) to You Sent for the activities of *Marketing*

Described at the point of this information dedicated to the purposes and The legal bases of the treatment (and, specifically, the activities to promote the direct sale of products or services similar to those which it has already purchased, using automated modes (e-mail, fax, SMS) and/or traditional (paper mail) to your contact details.

To exert The right of opposition you can Use the holder's contacts provided in this statement. The exercise of rights is not subject to any form constraint and is free of charge.

**Holder of the treatment**

The Data holder is: Holiday System S.R.L.

Contact Details:

- Email: [gdpr@holidaysystem.it](mailto:gdpr@holidaysystem.it)
- Phone: +39 0464 423854
- Mail Adress: Via Matteotti 1/E, 38065 Mori (TN) Italy

**Changes**

The present Information is in force since 09 February 2022. We can modify or simply update its contents, partly or completely, also because of changes in the applicable law. You will be Informed Of these changes as soon as they are introduced.