Privacy Notice pursuant to Art. 13 of Regulation (EU) 2016/679 – Voihotels S.p.A. – Newsletter

Please be informed that, in accordance with Regulation (EU) 2016/679 (hereinafter: the "**Regulation**"), your personal data will be processed by Voihotels S.p.A., with its registered office at Via Lugaro 15, 10126 Turin (TO), acting as the data controller ("**Controller**"). Voihotels S.p.A. is a subsidiary of the Alpitour Group, of which Alpitour S.p.A. is the parent company.

The Controller will process the personal data provided (first name, surname, e-mail address) for the following purpose:

a) **sending, via automated means** (e-mail, SMS, MMS, push notifications**), newsletters and promotional communications regarding Voihotels' products and initiatives, including those related to market research, participation in prize draws, and events organized by Voihotels**. Furthermore, please note that newsletters and promotional e-mail communications may incorporate tracking pixels to verify whether the communications have been viewed and to track interactions with them; this data may be used to adapt and improve the company's promotional communication strategies.
It is specified that the Controller collects a single consent for the marketing purposes described herein, in accordance with the General Provision of the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) titled "Guidelines on promotional activities and combating spam" dated July 4, 2013, and the Provision dated April 17, 2026, regarding the use of tracking pixels in e-mail communications.

The legal basis for the processing for the aforementioned purpose is the data subject's consent to the processing of their personal data (Article 6(1)(a) of the Regulation).

Providing your personal data for the purpose indicated above is optional; however, if you do not provide such data, the Data Controller will be unable to send you any newsletters.

Furthermore, your personal data will be processed by the Data Controller for the following purposes:

b) **Automatic generation of a unique identifier when creating the user profile, and association with the same identifier of the information provided to the Data Controller and the Group companies, in the case of subsequent contacts with them, in accordance with the respective information provided as independent Data Controllers**. The identifier is used to guarantee the coherence, accuracy and synchronization of the data in the event of a relationship established by the user (e.g. subscription to the newsletter, purchase of one or more services) with one or more companies of the Alpitour Group. The processing is carried out on the basis of the legitimate interest of the Data Controller; the data used solely for the purpose of allowing the user to be associated with a unique identifier (depending on the case: name, surname and date of birth; email; telephone) may be accessible to other companies in the Group for administrative-accounting purposes pursuant to art. 6.1.f) and Recitals 47 and 48 of the Regulation, in compliance with the principle of minimization referred to in Article 5, paragraph 1, letter c) of the Regulation.

c) **classification** (e.g. subdivision of interested parties by place of residence, age, gender and type of commercial relationship, such as for example the categories of potential customers, commercial contacts or regular customers, carried out through the extraction of macro-categories aimed at partitioning the data present in the database without the development of conclusions or predictions relating to the person) **and anonymous statistical analysis for intelligence purposes** (information and characteristics of the product purchased) **to improve the services and products offered to customers**. The legal basis of the

processing for the purposes referred to in the letter c) refers to the pursuit of the legitimate interest of the Data Controller aimed at improving the services and products offered to customers (art. 6.1.f) of the Regulation)

Your Personal Data may be shared with:

- individuals authorized by the Data Controller to process personal data by virtue of their job duties, subject to the signing of a confidentiality agreement (e.g., employees and system administrators);
- third-party entities under contract, some of which act as Data Processors (Article 28 of the Regulation). A complete and up-to-date list of the categories of Data Processors is available on the Data Controller's website, in the Privacy section;
- entities, bodies, or authorities to whom the disclosure of your Personal Data is mandatory under legal provisions or orders from public authorities.

Regarding any potential transfer of Data to third countries, the Data Controller informs you that such processing will take place in accordance with one of the methods permitted by applicable law—for example, based on the data subject's consent; the performance of a contract between the data subject and the Data Controller, or the implementation of pre-contractual measures taken at the data subject's request; the conclusion or performance of a contract between the Data Controller and another natural or legal person for the benefit of the data subject; the adoption of Standard Contractual Clauses approved by the European Commission; or the selection of entities that participate in international programs for the free movement of data or that operate in countries deemed "safe" by the European Commission. Further information may be obtained upon request by contacting the Data Controller using the details provided above.

In relation to the stated purposes, personal data is processed using manual, electronic, and automated tools, with logic strictly aligned to those purposes and in a manner that ensures the security and confidentiality of the data, in compliance with specific legal obligations.

Your Personal Data will be stored until you withdraw your consent. This is without prejudice to any further retention required by applicable law, including, for instance, the provisions of Article 2946 of the Italian Civil Code. Further information is available from the Data Controller.

You have the right to request, at any time, that the Data Controller grant you access to your Data, rectify or erase it, restrict its processing, object to its processing, or—in the cases provided for by Article 20 of the Regulation—receive the data concerning you in a structured, commonly used, and machine-readable format.

You may, at any time, withdraw your consent pursuant to... ...under Article 7 of the Regulation, you may withdraw the consent you have previously given, without affecting the lawfulness of any processing carried out prior to such withdrawal.

With specific regard to the use of tracking pixels in newsletters and promotional email communications, please note that you may partially withdraw the consent you have provided—specifically concerning the tracking associated with the use of these pixels—without preventing the future receipt of further messages.

In any event, you always have the right to lodge a complaint with the competent supervisory authority (the Italian Data Protection Authority, or *Garante per la Protezione dei Dati Personali*), pursuant to Article 77 of the Regulation, if you believe that the processing of your data violates applicable law.

Requests should be submitted in writing to the Data Controller at: privacy.voi@alpitourworld.it, or to the Data Protection Officer (DPO) at: dpo@voihotels.com.