PRIVACY POLICY:
PRIVACY NOTICE PURSUANT TO ART. 13 of Reg. (EU) 2016/679 - VOIHOTELS APP

Version 6, dated 26/10/2026

VOIhotels S.p.A., in its capacity as the Data Controller (hereinafter: the "Controller") pursuant to the European General Data Protection Regulation 2016/679 ("GDPR"), recognizes the importance of personal data protection and considers the privacy and safeguarding of personal data to be a primary objective of its operations.

We therefore invite you to read this Privacy Policy carefully before providing any personal data to the Controller, as it contains important information regarding your privacy, the protection of your personal data, and the security measures implemented to ensure confidentiality in full compliance with applicable legislation. Furthermore, this Privacy Policy:

- is provided in relation to the VOIhotels app (hereinafter: the "**Application**");
- also serves as a privacy notice, pursuant to Article 13 of the GDPR, for those who interact with the Application;
- complies with Recommendation no. 2/2001 regarding the minimum requirements for the collection of data online within the European Union, adopted on May 17, 2001, by the "Article 29" Working Party.

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The Data Controller informs you that the processing of your personal data will be based on the principles of fairness, lawfulness, and transparency, and will ensure the protection of your privacy and your rights. Consequently, your personal data will be processed in accordance with the legislative provisions of the GDPR and Legislative Decree 196/03 (Privacy Code), as well as the confidentiality obligations set forth therein.

TABLE OF CONTENTS

Below, we provide the table of contents for this Privacy Policy, allowing you to easily locate the information relevant to the processing of your personal data.

1. DATA CONTROLLER AND DATA PROCESSORS

2. PERSONAL DATA SUBJECT TO PROCESSING
2.1 Browsing data
2.2 Data provided voluntarily by the user
2.3 Information regarding the use of SDKs

3. PURPOSES OF PROCESSING AND MANDATORY OR OPTIONAL NATURE OF DATA PROVISION
4. PROCESSING METHODS, SECURITY, AND LOCATION OF DATA PROCESSING
5. RETENTION OF PERSONAL DATA
6. DISCLOSURE AND DISSEMINATION
7. YOUR RIGHTS
8. AMENDMENTS
9. CONTACTS

1. DATA CONTROLLER AND DATA PROTECTION OFFICER

Following the consultation and use of the Application, data relating to identified or identifiable natural persons may be processed. The identification details of the Data Controller—who also manages the Site and the Application—are as follows: VoIhotels S.p.A., a company with its registered office at Via Lugaro 15, Turin; VAT number, Tax Code, and Chamber of Commerce registration number: 04416641001.

VOIhotels S.p.A. is a subsidiary of the Alpitour Group, with Alpitour S.p.A. acting as the parent company.

The Data Protection Officer (“DPO”) can be contacted at: dpo@voihotels.com.

2. PERSONAL DATA SUBJECT TO PROCESSING

2.1 Browsing data

During their normal operation, the IT systems and software procedures used to run the Application acquire certain personal data, the transmission of which is implicit in the use of Internet communication protocols. This information is not collected for the purpose of associating it with identified individuals; however, by its very nature, it could—through processing and association with data held by third parties—allow for the identification of users. This category of data includes IP addresses or domain names of the devices used by individuals who connect to the Application, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful, error, etc.), and other parameters related to the user's operating system and IT environment. This data is used to derive anonymous statistical information regarding the use of the Application and to monitor its proper functioning; to ensure—given the architecture of the systems employed—the correct delivery of the various features requested by the user; and for security purposes, including the investigation of potential cybercrimes directed against the Application or third parties.

Browsing data is saved for all users who interact with the Application, whether they are registered users or not.

2.2 Data provided voluntarily by the user

To access features offered through the Application that are reserved for registered users, a login is required using the following personal data: first name, last name, email address, date of birth, and information related to your booking—such as a reservation/voucher code and arrival date.

This data is provided voluntarily and will be processed in full compliance with data protection regulations. Failure to provide this data will result solely in the inability to log in and access certain features.

The user is responsible for the accuracy of the data entered into their profile and guarantees that such information is correct.

2.3 Information regarding the use of SDKs

- React Native library by Facebook Inc.
- Yarn package manager
- NPM package manager
- Expo SDK
- Firebase SDK

3. PURPOSES OF PROCESSING AND MANDATORY OR OPTIONAL NATURE OF DATA PROVISION

The data you provide to us through the Application will be processed by the Data Controller for the following purposes:

> **a) Fulfillment of obligations arising from a contract to which the data subject is a party, or to comply with specific requests made by the data subject prior to the conclusion of a contract.**

In particular:

> i. Logging in (The data provided during the login process will be compared against information held by the Data Controller regarding your stay in order to confirm your access.)

Please note that this function should only be used on trusted devices—those whose origin is known, and which are owned and used by the person named on the booking and their accompanying guests—rather than on devices belonging to others, or on public or shared devices.

ii. Accessing information about the selected property.

iii. Making choices regarding your stay, such as booking the property's restaurant or reserving services made available at the property.

Providing your data for the purposes referred to in letter (a) is optional; however, failure to provide such data may make it impossible for the requested features to function. We do not request consent for the processing of personal data for these purposes, as "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract" (cf. Art. 6, paragraph 1, letter b of the GDPR).

b) Sending push notifications containing service-related information.

Please note that, by default, push notifications are disabled upon installation of the application.

The legal basis for the processing of your data for the aforementioned purpose is the consent provided by the data subject (Article 6, paragraph 1, letter a) of the GDPR).

Failure to provide your consent for this purpose will not affect your ability to use the services of the Application.

c) fulfillment of obligations required by law, regulations, or EU legislation.

Providing your data for the purpose listed above (c) is mandatory. Failure to provide such data would prevent the Data Controller from fulfilling obligations required by law, regulations, or EU legislation.

Furthermore, your personal data will be processed, subject to your specific consent, for the following purpose:

d) sending—via automated tools (e-mail, automated telephone systems such as SMS, MMS, or 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. Please note that newsletters and promotional e-mails may include tracking pixels to verify whether the communications have been viewed and to track interactions with them; this information may be used to adapt and improve the company's promotional communication strategies. The Data Controller obtains a single consent for the marketing purposes described here, in accordance with the General Provision of the Italian Data Protection Authority ("Guidelines on promotional activities and the fight against 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 processing for the purpose referred to in letter d) is the data subject's consent to the processing of their personal data (Art. 6, para. 1, letter a of the GDPR).

The data subject may withdraw their consent or object to such processing at any time, easily and free of charge, by writing to the Data Controller's Privacy Department at the following address: privacy.voi@alpitourworld.it.

Failure to provide the data and/or consent for this purpose will not affect the use of the services offered and will have no consequences.

e) to analyze the details of your purchases (e.g., types of payment methods used, your responses to market research, purchase volume, travel destinations, etc.) **and/or your browsing behavior and usage of our websites and the Application, in order to define a profile of your preferences for statistical, commercial, and/or marketing purposes.**

The legal basis for processing for the purpose referred to in letter e) is the data subject's consent to the processing of their personal data (Art. 6, para. 1, letter a of the GDPR).

Failure to provide the data and/or consent for this purpose will not affect your ability to use the services offered and will have no consequences.

Furthermore, based on the relationship established with the user (e.g., subscription to the newsletter, purchase of one or more services), personal data may be processed by the Data Controller for the following purposes:

f) automatic generation of a unique identifier upon the creation of a user profile, and the association of information provided to the Data Controller and to Group companies—in the event of subsequent interactions with them—with this same identifier, in accordance with the respective privacy policies provided by these entities in their capacity as independent Data Controllers. This identifier is used to ensure the consistency, accuracy, and synchronization of data in the context of a relationship established by the user (e.g., subscription to the newsletter, purchase of one or more services) with one or more companies within the Alpitour Group. This processing is carried out based on the legitimate interest of the Data Controller. Data used solely for the purpose of associating a user with a unique identifier (depending on the case: first name, surname, and date of birth; email address; or telephone number) may be accessed by other companies within the Group for administrative and accounting purposes, pursuant to Article 6.1(f) and Recitals 47 and 48 of the Regulation, in compliance with the data minimization principle set forth in Article 5(1)(c) of the Regulation.

g) Classification (e.g., segmenting data subjects by place of residence, age, gender, and type of commercial relationship—such as categories of potential customers, business contacts, or regular customers—by extracting macro-categories to partition the data within the database, without drawing conclusions or making predictions about specific individuals) **and anonymous statistical analysis for intelligence purposes (regarding information and characteristics of purchased products) to improve the services and products offered to customers.**

The legal basis for processing for the purpose referred to in letter (g) is the pursuit of the Data Controller's legitimate interest in improving the services and products offered to customers (Article 6.1(f) of the Regulation)

4. DATA PROCESSING METHODS, SECURITY, AND LOCATION

Your personal data are processed by the Data Controller—or by third parties carefully selected for their reliability and competence, and duly appointed as data processors—strictly for the purpose of achieving the objectives specified above. Processing is carried out primarily through automated tools, though paper-based records may also be used, and data are retained only for the time strictly necessary to achieve the purposes for which they were collected. Specific security measures are implemented to prevent data loss, illicit or incorrect use, and unauthorized access, in full compliance with the requirements of Article 32 of the GDPR.

Your data will not be transferred to countries outside the European Union.

5. RETENTION OF PERSONAL DATA

Your Personal Data will be retained only for the time necessary for the purposes for which they are collected, in accordance with the data minimization principle set forth in Article 5, paragraph 1, letter c) of the GDPR. In any case, your personal data will be retained for the duration required to fulfill the services stipulated in the contract.

Specifically:

- Data provided by the user for login purposes will be retained for 5 years;
- Data relating to bookings (restaurants, services) will be retained for 5 years;
- Personal and contact data processed—subject to your consent—for the purpose of sending newsletters and promotional communications (purpose d)) will be retained until such consent is withdrawn;
- Data concerning purchase details and travel arrangements, processed—subject to your consent—for profiling purposes (purpose e)), will be retained for 5 years or until consent is withdrawn, whichever occurs first; the data subject retains the right, at any time, to object to such profiling pursuant to Article 21.2 of the Regulation and to request the deletion of said data.

In all cases, data may be retained for longer periods as required by applicable law, including the provisions of Article 2946 of the Italian Civil Code. Further information may be obtained from the Data Controller.

6. COMMUNICATION AND DISCLOSURE

Your personal data may be disclosed to entities, bodies, or authorities to whom such communication is mandatory under legal or regulatory provisions. It may also be accessed by employees or collaborators of the Data Controller—such as administrative, sales, legal, or accounting staff, or IT system administrators, depending on the specific processing activity—who operate under the Data Controller's direct authority. These individuals are designated as processors or persons authorized to process data pursuant to Articles 28 and 29 of the GDPR and receive appropriate operational instructions in this regard.

An up-to-date list of the categories of data processors is available on the Data Controller's website (www.voihotels.com) under the "Privacy" section in the footer.

7. YOUR RIGHTS

Pursuant to Articles 15 et seq. of the Regulation, you have the right to request access to your personal data, its rectification, or its erasure at any time. You may also object to the processing of your data, request the restriction of processing in the cases provided for by Article 18 of the Regulation, and—in the cases provided for by Article 20 of the Regulation—obtain your personal data in a structured, commonly used, and machine-readable format.

Furthermore, pursuant to Article 21 of the Regulation, you have the right to object at any time to the processing of your personal data for direct marketing purposes, including profiling.

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

You may, at any time, revoke your consent in accordance with... ...consent provided under Article 7 of the Regulation; and to lodge a complaint with the competent supervisory authority—the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*)—pursuant to Article 77 of the GDPR, if you believe that the processing of your data violates applicable law.

Requests should be addressed in writing to the Privacy Department of the Data Controller at privacy.voi@alpitourworld.it, or to the Data Protection Officer ("DPO") using the contact details provided above.

8. AMENDMENTS

The Data Controller may modify or update this Application's Privacy Policy, in whole or in part, including in response to changes in the legislative or regulatory provisions that govern this subject matter and protect your

rights. Such changes and updates to the Privacy Policy shall be binding as soon as they are published. We therefore invite you to visit this section regularly to review the most recent and updated version of this Privacy Policy, ensuring you remain informed about the data we collect and how we use it.

9. CONTACTS

If you would like to receive any information regarding the processing of your data by the Data Controller, you may send a communication to the following address: privacy.voi@alpitourworld.it.