Privacy Notice – Art. 13 of EU Regulation 2016/679 ("Regulation") – VOIhotels S.p.A. – Wi-Fi Captive Portal

Data Controller and Purposes of Processing

Pursuant to EU Regulation 2016/679 (hereinafter: the "**Regulation**"), please be informed that the personal data you provide via the WiFi Access Portal (first name, surname, gender, date of birth, and, where applicable, email address, language, and country) will be processed by **VOIhotels S.p.A**., with its registered office at Via Lugaro, 15 - 10126 Turin (TO), in its capacity as the Data Controller (hereinafter, the "**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 your data for the following purpose:

a) provision of internet access (hotspot service) within the areas of the hotel property covered by access points.

Registration may be completed using credentials provided by a third party via "Social Login" services (a method by which a user automatically shares personal data stored on a social network), such as Facebook, Twitter, or LinkedIn accounts.

In such cases, you should check the settings for that service and carefully read the third-party provider's privacy policy, as you may be authorizing the third-party provider to share your personal data and permitting the Controller to collect information such as contact details.

The Controller acquires and retains the following data linked to your account with the third-party service: first name, surname, gender, and email address. This data will be retained for as long as is necessary to provide the requested services.

The data collected also includes log files (login and logout records). The legal basis for the processing is the performance of a contract to which the data subject is a party, or the implementation of pre-contractual measures taken at the data subject's request (Article 6(1)(b) of the Regulation).

b) defense purposes

The legal basis for the processing is the pursuit of the Data Controller's legitimate interest (Article 6(1)(f) of the Regulation), specifically the exercise or defense of legal claims.

Providing your personal data for the aforementioned purpose is optional; however, failure to do so will make it impossible to provide the internet access service.

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

c) 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—during 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 event that the user establishes a relationship (e.g., newsletter subscription, purchase of one or more services) with one or more companies within the Alpitour Group. This processing is carried out based on the Data Controller's legitimate interest; the data used solely for the purpose of associating the user with a unique identifier (which may include, depending on the case, first name, surname, and date of birth; email address; or telephone number) may be accessible to other companies within the Group for administrative and accounting purposes, pursuant to Art. 6.1.f) and Recitals 47 and 48 of the Regulation, in compliance with the principle of data minimisation referred to in Article 5, paragraph 1, point (c) of the Regulation.

d) **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 clients—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 about and characteristics of purchased products), **in order to improve the services and products offered to customers.**

The legal basis for processing for the purpose referred to in letter d) 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).

Furthermore, your personal data (first name, surname, e-mail address) will be processed, subject to your specific consent, for the following purpose:

e) sending—via automated means (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, prize draws, and events organized by Voihotels. Additionally, 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. Please note that the Data 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 "Guidelines on the use of tracking pixels in email communications."

The legal basis for the processing of your data for the purpose referred to in letter e) is the consent provided by the data subject for the processing of their personal data for the aforementioned purpose, pursuant to Article 6(1)(a) of the Regulation.

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

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 negative consequences.

Finally, your personal data (first name, surname, date of birth, email address, language used to connect to the Wi-Fi access portal, and the property where you are staying) will be processed, subject to your specific consent, for the following purpose:

f) **disclosure of personal data to third parties (companies offering excursion and tour services, vehicle rentals, and transfer services) for the purpose of sending newsletters and promotional communications regarding their own products and initiatives via automated means**.

A list of the companies to which such data may be disclosed is available on the Data Controller's website, within the privacy section.

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

Providing your personal data for this purpose is optional; there are no consequences should you choose to refuse.

Recipients of Personal Data

Your Personal Data may be shared with:

- individuals authorized by the Data Controller to process personal data;
- third-party entities under contract that are involved in the management of information systems and corporate web platforms, some of whom act as Data Processors (pursuant to Article 28 of the Regulation). (A complete and updated list of Data Processors is available on the website www.voihotels.com);
- 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: 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 entered into 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 contact details provided above.

Retention of Personal Data

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

Specifically:

- Account data and related log files (login and logout) will be retained for a period of 8 days following the guest's departure date.
- Personal and contact data processed—subject to your consent—for the purpose of sending newsletters and promotional communications (purpose e)) will be retained until such consent is withdrawn.

This is without prejudice to any further retention required by applicable law, including the provisions of Article 2946 of the Italian Civil Code. Further information may be obtained from the Data Controller.

Privacy Rights of the Data Subject (pursuant to Articles 15 et seq. of the Regulation)

You have the right to request from the Data Controller, at any time, access to your Personal Data, its rectification or erasure, the restriction of its processing, or to object to such processing. You also have the right to obtain the data concerning you in a structured, commonly used, and machine-readable format, in the cases provided for by Article 20 of the Regulation.

Furthermore, you have the right to object to the processing of your data on legitimate grounds, pursuant to Article 21 of the Regulation. For example, you may object at any time to the receipt of direct marketing communications sent via automated means (e-mail, automated telephone calls—e.g., SMS, MMS, push notifications); you may also exercise this right in part.

You may, at any time, withdraw your consent, pursuant to Article... ...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 continued receipt of future messages.

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.

In any event, you always have the right 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 Regulation, if you believe that the processing of your data violates applicable law.