Privacy Notice – Art. 13 of EU Regulation 2016/679 (“Regulation”) – VOIhotels S.p.A. – Check-in

Data Controller and Purposes of Processing

Regarding the personal data (as defined in Art. 4.1 of the Regulation) that you provide, please be informed that such data 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) **managing your stay at our property**

The legal basis for this 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 (Art. 6, paragraph 1, letter b) of the Regulation).

Your data will be processed using manual, electronic, and/or automated means. The processing may also include special categories of personal data (pursuant to Art. 9 of the Regulation—e.g., information regarding a guest with a disability); in such cases, the legal basis for processing shall be your explicit consent to the processing of said data for the purpose specified above, in accordance with Art. 9, paragraph 2, letter a) of the Regulation.

Please note that the data collected and provided by you may also pertain to your family members, guests, or accompanying persons.

b) compliance with regulatory obligations (specifically, the communication of your data to public security authorities), as well as tax and accounting obligations

The legal basis for this processing is compliance with a legal obligation to which the Controller is subject (Art. 6, paragraph 1, letter c) of the Regulation). Providing your data for the purposes referred to in points a) and b) is necessary for the conclusion of the contract and compliance with legal obligations.

When sending mandatory emails—or emails related to regulatory and/or security requirements—for the purposes set out in points a) and b), the communications may include pixels or other tracking tools. These are used to verify whether the communications have been viewed and to track interactions with them. This allows for the assessment of whether other communication channels should be used to ensure receipt, and serves to demonstrate to competent authorities and stakeholders that the messages were indeed received and viewed.

c) disclosing information regarding your stay to third parties, for the sole purpose of enabling you to receive messages and telephone calls addressed to you.

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

Providing your personal data for the purpose referred to in letter c) is optional; there are no consequences should you choose to refuse.

d) 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 companies within the Group—during any 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 whenever a user engages with one or more companies within the Alpitour Group (e.g., by subscribing to a newsletter or purchasing one or more services). This processing is carried out based on the Data Controller's legitimate interest; the data used solely to associate the user with a unique identifier (which may include, depending on the case, first name, surname, date of birth, email address, or telephone number) may be accessible to other companies within the Group for administrative and accounting purposes, pursuant to Article 6(1)(f) and Recitals 47 and 48 of the Regulation, while adhering to the principle of data minimization as set forth in Article 5, paragraph 1, letter c) of the Regulation.

e) classification (e.g., segmenting data subjects based on place of residence, age, gender, and type of business relationship—such as categorizing them into 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** (concerning information about and characteristics of purchased products**), aimed at improving the services and products offered to customers.**

The legal basis for processing for the aforementioned purpose is the pursuit of the Data Controller's legitimate interest in improving the services and products offered to customers (Article 6, paragraph 1, letter f) of the Regulation).

For processing activities carried out for the purpose of **sending the Data Controller's own advertising material, conducting direct sales, performing market research, or sending commercial communications regarding products or services offered by the Data Controller that are similar to those already purchased**, the Data Controller may use email addresses and postal addresses—without requiring the data subject's consent—in accordance with and within the limits set forth by Article 130, paragraph 4, of Legislative Decree 196/03 and the provision issued by the Italian Data Protection Authority (Garante per la protezione dei dati personali) on June 19, 2008.

The legal basis for processing your data for this purpose is Article 6, paragraph 1, letter f) of the Regulation. You have the right to object to such processing at any time—whether initially or in connection with subsequent communications—easily and free of charge, by writing to: privacy.voi@alpitourworld.it.

Furthermore, should you wish to object to the processing of your data for marketing purposes carried out via the means described here, or to withdraw any consent previously given, you may do so at any time by contacting the Data Controller using the contact details provided in this privacy notice. Such an objection or withdrawal will not affect the lawfulness of any processing based on consent given prior to the withdrawal.

Providing your personal data for the aforementioned purpose is optional; there are no consequences should you choose not to provide it.

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

f) **sending, via automated means (e-mail; automated telephony—e.g., SMS, MMS, push notifications), newsletters and promotional communications regarding Voihotels' products and initiatives, including those aimed at conducting market research and facilitating participation in prize draws or events organized by Voihotels.** Furthermore, please note that newsletters and promotional e-mails may contain 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. The Data Controller collects a single, unified 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 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 the processing activity referred to in point (f) is the data subject's consent to the processing of their personal data (Art. 6, paragraph 1, letter a of the GDPR).
Data subjects may withdraw their consent or object to this processing at any time, easily and free of charge, by contacting the Data Controller's Privacy Department at: privacy.voi@alpitourworld.it.

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

g) 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 use of the platform, the "Reserved Area" of our websites, and the application, in order to create a profile of your preferences for statistical, commercial, and/or marketing purposes.**
The legal basis for processing data for the purpose referred to in letter g) is the data subject's consent to the processing of their personal data (Art. 6, paragraph 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.

Recipients of Personal Data

Your Personal Data may be shared with:

- individuals authorized by the Data Controller to process personal data;
- third parties that carry out business activities, some of whom act as Data Processors (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 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.

Storage of personal data

Your Personal Data will be kept only for the time necessary for the purposes for which they are collected, respecting the principle of minimization referred to in Article 5, paragraph 1, letter c) of the GDPR. In any case, your personal data will be kept for the time necessary for the execution of the services provided for in the contract, in particular 10 years for personal data.

Furthermore:

- The personal and contact data processed, subject to consent, for the sending of newsletters and promotional communications (purpose f)) will be retained until the consent itself is revoked;
- The data relating to the details of purchases and travel documents processed, subject to consent, for the profiling purpose (purpose g)) are retained for 5 years or until consent is revoked, if earlier; The interested party still has the possibility, at any time, to object to profiling processing pursuant to art. 21.2 of the Regulations and request the deletion of the aforementioned data.

In any case, this is without prejudice to the further conservation provided for by the applicable legislation including that provided for by the art. 2946 cod. civil More information is available from the Owner.

Privacy rights of the interested party (pursuant to articles 15 et seq. of the Regulation)

You have the right to ask the Data Controller, at any time, to access your Data, to rectify or delete it, to request the limitation of processing or to oppose it, to obtain the data concerning you in a structured, commonly used and machine-readable format in the cases provided for by the art. 20 of the Regulation.

We also inform you that, pursuant to art. 21 of the Regulation, you have the right to object at any time to the processing of personal data concerning you, carried out for direct marketing purposes, including profiling.

At any time you may revoke pursuant to art. 7 of the Regulation, the consent already given, without this affecting the lawfulness of the processing carried out before the revocation of the consent.

With specific reference to the use of tracking pixels in newsletters and promotional communications via e-mail, we inform you that it is possible to only partially revoke the single consent given, with exclusive regard to tracking connected to the use of tracking pixels, without preventing the future receipt of further messages.

Requests must be sent in writing to the Data Controller at privacy.voi@alpitourworld.it or to the Data Protection Officer (“DPO”) at the address: dpo@voihotels.com.

In any case, you always have the right to lodge a complaint with the competent supervisory authority (Guarantor for the Protection of Personal Data), pursuant to art. 77 of the Regulation, if you believe that the processing of your data is contrary to the legislation in force.

FORMULE DI CONSENSO

☐ I consent to the processing of my personal data for the purpose of receiving—via automated means (such as email, or non-live telephone communications like SMS, MMS, or push notifications)—newsletters and promotional communications regarding Voihotels' products and initiatives. This includes communications related to market research, as well as participation in prize draws and events organized by Voihotels. By providing this consent, I also authorize the inclusion of tracking pixels within email-based newsletters and promotional communications, in order to verify whether these communications are viewed and how users interact with them; this data may be used to adapt and improve the company's promotional communication strategies.

☐ I consent to the processing of my personal data for the purpose of analyzing my purchase details (e.g., types of payment methods, my responses to market research, purchase volume, travel destinations, etc.) and/or my browsing behavior and usage of the "Reserved Area" platform, websites, and the application, in order to create a profile of my preferences for statistical, commercial, and/or marketing purposes.