

PRIVACY POLICY:

INFORMATION ART. 13 Reg. (EU) 2016/679 - VOIHOTELS APP Version 5 of 13/02/2025

VOIhotels S.p.A., as Data Controller of personal data (hereinafter: "Data Controller") pursuant to the European Regulation on Data Protection 2016/679 ("GDPR"), recognizes the importance of protecting personal data and considers privacy and the protection of personal data one of the main objectives of its business.

We therefore invite you, before communicating any personal data to the Data Controller, to carefully read this Privacy Policy, as it contains important information on your privacy, protection of personal data and on the security measures adopted to guarantee confidentiality in full compliance with applicable legislation. This Privacy Policy also:

- is intended for the APP VOIhotels application (hereinafter: "Application");
- is also to be understood as Information provided pursuant to art. 13 of the GDPR to those who interact with the Application;
- complies with Recommendation no. 2/2001 concerning minimum requirements for online data collection in the European Union, adopted on 17 May 2001 by the Article 29 Working Party

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

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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 identifying details of the Data Controller and manager of the Site and the Application are as follows: Volhotels S.p.A., a company with registered office in Via Lugaro, 15 Turin, VAT no. 04416641001, Tax code and registration with the Chamber of Commerce under no. 04416641001

VOIhotels S.p.A. is a subsidiary of the Alpitour Group of which Alpitour S.p.A. is the parent company.

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

2. PERSONAL DATA SUBJECT TO PROCESSING

2.1 Browsing data

The computer systems and software procedures used to operate the Application acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of the devices used by users who connect to the application, the 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 obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment.

These data are used to obtain anonymous statistical information on the use of the Application and to check its correct functioning, to allow - given the architecture of the systems used - the correct provision of the various functions requested by the user, for security reasons and to ascertain responsibility in the event of hypothetical computer crimes 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 the features offered through the Application and reserved for registered users, login is required using the following personal data: name, surname, email, date of birth and data relating to your practice, such as the booking code/voucher and the date of arrival.

These data are provided voluntarily and will be processed in full compliance with data protection legislation. Failure to provide these data will only result in the inability to log in and access certain features.

The user is responsible for the accuracy of the data entered in the profile and guarantees the accuracy of the same.

2.3 Information relating to the use of SDK

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

3. PURPOSE OF THE PROCESSING AND MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA

The data you provide 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 interested party is a party or to fulfill, before the conclusion of the contract, specific requests of the interested party.

In particular,

- i. log in (The data provided during the login phase will be compared with the information relating to your stay in the possession of the Data Controller in order to confirm your access.); Please remember to use this function only with trusted devices, of which you know the origin and owned and used by the practice holder and the related guests, and not through other people's tools, whether public or shared.;
- ii. access information on the selected facility
- iii. make choices relating to your stay, such as booking the restaurant of the facility and booking the services made available therein.
- iv. Sending push notifications containing service information.

The provision of your data for the purposes referred to in letter a) is optional, but failure to provide them could make it impossible for the requested functions to function. We do not require consent to the processing of personal data for these purposes because "the processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures adopted at the request of the data subject" (see art. 6, par. 1, lett. b GDPR).

b) fulfillment of obligations established by law, by a regulation or by community legislation

The provision of your data for the purpose listed above (b) is mandatory. Failure to provide them would not allow the owner to fulfill the obligations established by law, by a regulation or by community legislation.

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

c) sending, with automated tools (e-mail; telephone without operator - e.g. sms, mms, push notifications), **newsletters and promotional communications on the products and initiatives of Voihotels, including those aimed at conducting market research and participation in prize competitions and events organized by Voihotels.** Please note that the Data Controller collects a single consent for the marketing purposes described here, pursuant to the General Provision of the Guarantor for the Protection of Personal Data "Guidelines on promotional activities and the fight against spam" of 4 July 2013.

The legal basis for processing for the purpose referred to in letter c) is the expression of consent by the interested party to the processing of their personal data (art. 6, par. 1, letter a GDPR).

The interested party has the possibility to revoke the consent given and to oppose such processing at any time easily and free of charge, by writing to the Privacy Service at the Data Controller at the address: privacy.voi@alpitourworld.it.

Failure to provide data and/or consent for this purpose will not affect the use of the services offered and will not have any consequences.

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

The legal basis of the processing for the purpose referred to in letter d) is the expression of consent by the interested party to the processing of his/her personal data (art. 6, par. 1, letter a GDPR).

The failure to provide data and/or consent for this purpose will not affect the use of the services offered and will not have any consequences.

e) Communication of personal data to third parties (the other companies of the Alpitour Group) for the purpose of sending, with automated tools, newsletters and promotional communications on their products and initiatives.

The list of Group companies to which the communication is addressed is available on the Data Controller's website - privacy area.

The legal basis of the processing for the purpose referred to in letter e) is the expression of consent by the interested party to the processing of their personal data (art. 6, par. 1, letter a GDPR).

Failure to provide data and/or consent for this purpose will not affect the use of the services offered and will not have any consequences.

4. DATA PROCESSING METHODS, SECURITY AND PLACE OF DATA PROCESSING

Your personal data are processed by the Data Controller - or by third parties carefully selected for their reliability and competence and rightfully appointed as data controllers - limited to the achievement by the same of the purposes specified above, mainly with automated tools, but also in paper form, for the time strictly necessary to achieve the purposes for which they were collected.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access in full compliance with the provisions of art. 32 GDPR.

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

5. PERSONAL DATA STORAGE

Your Personal Data will be stored 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 retained for the time necessary to perform the services provided for in the contract.

In particular:

- The data provided by the user for login will be retained for 5 years;
- The data relating to reservations (restaurants, services) will be retained for 5 years;
- The personal and contact data processed, subject to consent, for sending newsletters and promotional communications (purpose c)) will be retained until the consent is revoked;
- The data relating to purchase details and travel arrangements processed, subject to consent, for the purpose of profiling (purpose d)) are retained for 5 years or until the consent is revoked, if earlier; the interested party retains the right, at any time, to object to the profiling processing pursuant to art. 21.2 of the Regulation and request the deletion of the aforementioned data.

In any case, the further retention required by applicable legislation is reserved, including that provided for by art. 2946 of the Civil Code. Further information is available from the Data Controller.

6. COMMUNICATION AND DISSEMINATION

Your personal data may be disclosed to subjects, entities or Authorities, to whom communication is mandatory by law or regulation; employees or collaborators of the Data Controller, belonging to the categories of administrative, commercial, legal, accounting or IT system administrators, depending on the processing, who, operating under the direct authority of the latter, are appointed as data controllers or processors pursuant to Articles 28 and 29 of the GDPR and receive adequate operating instructions in this regard.

The updated list of the categories responsible for processing is available on the Data Controller's website (www.voihotels.com) under the "Privacy" heading in the footer.

7. YOUR RIGHTS

Pursuant to Articles 15 and following of the Regulation, the user has the right to request at any time, access to his/her personal data, the correction or deletion of the same, to oppose the processing, to request the limitation of the processing in the cases provided for by art. 18 of the Regulation, obtain in a structured, commonly used and machine-readable format the data concerning you, in the cases provided for by 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 can revoke the consent given pursuant to art. 7 of the Regulation; lodge a complaint with the competent supervisory authority pursuant to art. 77 of the GDPR (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.

Requests must be sent in writing to the Privacy Service at the Data Controller at privacy.voi@alpitourworld.it or to the Data Protection Officer (“**DPO**”) at the contact details indicated above.

8. AMENDMENTS

The Data Controller may modify or simply update this Application Privacy Policy, in part or completely, also due to changes in the legislative and regulatory provisions that govern this matter and protect your rights. Such changes and updates to the Privacy Policy will be binding as soon as they are published. We therefore invite you to visit this section regularly to take note of the most recent and updated version of this Privacy Policy so that you are always updated on the information we collect and how we use it.

Last update: 13/02/2025

9. CONTACTS

If you wish to receive any information on the processing of your data by the Data Controller, you can send a communication to the following address: privacy.voi@alpitourworld.it.