

With this information, we wish to inform you about the processing of personal data you provide, in compliance with the applicable data protection regulations. The information is given pursuant to Articles 13 and 14 of the European Regulation on data protection (also referred to as GDPR)

and Italian sector regulations (hereinafter, collectively, the one and the other, the **“Regulation Applicable”**).

This information may be amended and/or supplemented and/or updated, also as a result of updates to the applicable data protection regulations.

1. Data Controller.

The Data Controller is Lake Garda Travels S.r.l. with registered office at Via Portici Umberto Primo, 2/3 – 37018 Malcesine (VR), Tax Code and VAT 04242010231, VR-404367 REA number, Share Capital EUR 58,824.00, hereinafter **also “Data Controller” or simply “Controller”**.

For any clarification, information, or to exercise the rights listed in this Information, you can contact the Data Controller at the following numbers: +39 0457400512 / 0464521745, email: admin@lakegardatravels.com, Certified Email (PEC): lakegardatravels@pec.it.

2. Purposes and legal bases of processing.

The Controller collects and processes data relating to the customer, identification and contact personal data of individuals acting on behalf of and for the customer and/or in its interest, data of participants in the experience/tour such as travelers, group members when the booking is made by a third party such as a group leader or corporate contact (hereinafter, respectively, the “Data” and the “Subjects”), such as first name, last name, email, phone, booking data, date, time, number of participants, language, meeting place and other information necessary to provide the service.

For the processing of personal data relating to other participants in the experience/tour, please provide accurate publicity of what is contained in this information.

Data may be collected:

- directly (website, points of sale, email/phone contacts);
- indirectly through booking platforms/marketplaces (OTA) and related distribution channels that provide us with the data necessary to fulfill the service.

Examples of platforms/channels through which bookings may come: GetYourGuide, TripAdvisor, and platforms linked to the Bókun management system (e.g., Musement, Winedering, Toursexplorer, Nowthingstodo).

	PURPOSES	LEGAL BASIS
a.	Manage the pre-contractual relationship; manage and to perform the contract and all activities related to it connected (including post-sale service), to for example, confirmation and management of the service, organization of the tour, customer support, operational communications (e.g., changes weather/timings or logistics).	The processing is necessary for the execution of a to which the data subject is a party or the execution of pre-contractual measures adopted upon request by the data subject [Art. 6(1)(b) GDPR].

b.	<p>Comply with administrative obligations <small>and/or accounting and/or tax related to contracts entered into by the customer (e.g., collection management)</small> with the customer (for example, collection management and payments, issuance of the invoice) and fulfill additional legal obligations to which the Controller is subject, including those under current data protection law, on the protection of personal data.</p>	<p>Processing is necessary to fulfill a legal obligation to which the data controller is subject [art. 6(1)(c) GDPR].</p>
c.	<p>Take appropriate precautions to indemnify the Controller and/or employees and/or collaborators from any liability arising from breaches of contracts entered into with the client and, more generally, to ascertain, exercise or defend a right in court or out of court, and whenever judicial authorities perform their functions (e.g., complaints and disputes)</p>	<p>The processing is necessary to pursue the legitimate interest of the Controller to be held harmless from any liability and to ascertain, exercise or defend a right in court or judicial proceedings or whenever judicial authorities exercise their functions [art. 6(1)(f) GDPR].</p> <p>The processing based on legitimate interest has been subject to a balancing assessment between our interests and the rights and freedoms of the data subject. At any time the data subject may object to the processing for reasons related to their particular situation (art. 21 GDPR).</p>
d.	<p>Processing of special categories of data (art. 9 GDPR): if is voluntarily communicated to us, information related to, for example, allergies, intolerances or disabilities, we will process them, exclusively to manage the safe experience and, if necessary, share them only with the entities involved in the provision of the service.</p>	<p>the provision of special category data (e.g., disability, allergies, dietary preferences) is optional. If such information is not provided, we may not be able to take measures to ensure specific attentions required for the delivery of the service. If such information is provided to us communicated via booking notes or other channels, we may require explicit consent before using them and/or communicating them to the involved suppliers (e.g., facilities, guides, restaurants) solely to manage the requested experience. [art. 6(1)(a) GDPR] and [art. 9(2)(a) GDPR].</p>

3. Data retention period.

Data will be kept for no longer than necessary for the purposes described above and, in any case, no longer than the following maximum retention periods:

- ☑ contractual and fiscal data: 10 years (civil and tax obligations);
- ☑ contact details and operational data: for a period of 12 months following service completion. In case of complaints, disputes or post-service support requests, data may be kept until file closure and, if necessary, until the applicable prescription terms expire;
- ☑ special category data (allergies/disabilities): for the only time required to safely manage the service, and in any case deleted or anonymized as soon as no longer necessary.

4. Nature of the provision.

Providing the Data is necessary to conclude the contracts, perform them and satisfy the legal obligations on the Controller. Therefore, any refusal to provide them in whole or in part may prevent the Controller from concluding the contracts and/or enforcing them.

5. Data Processing Methods.

Processing is carried out using computer and/or paper tools, adopting technical and organizational measures in accordance with Art. 32 GDPR (e.g. access control, tracking/logging, backups, authorization procedures, and staff instructions).

We use management software for bookings (booking engine/channel manager), including the Bókun platform for operational management of bookings and synchronization of availability between sales channels, with storage on cloud infrastructures and appropriate security measures (e.g. access control, tracking, backups).

6. Data Recipients.

Data may be disclosed, to the extent necessary, to:

- authorized and trained internal staff;
- suppliers and operational partners involved in delivering the service (e.g. tour guides, skippers, transport), who will process the data only for service management;
- IT providers and management platform providers (e.g. Bókun and other tools), acting as Data Processors under Art. 28 GDPR, where applicable;
- Administrative-accounting and tax consultants (e.g. accountants), banks and/or payment service providers, as well as invoicing/financial management service providers, to the extent necessary to meet legal obligations and manage payments;
- public authorities/competent entities, when required by law.

Some entities (e.g. carriers or accommodations) may operate as autonomous data controllers if they determine the purposes and means of processing independently; in such cases, their respective notices apply.

7. Transfers to third countries or international organizations.

Data are normally processed within the EEA. If transfers to non-EEA countries become necessary through technology providers or platforms, the Controller will adopt appropriate safeguards (e.g. third countries with adequacy decisions or EU Standard Contractual Clauses approved by the European Commission) and, where required, additional measures.

Further information on transfers (including involved providers and safeguards adopted, e.g. SCCs) is available upon request by the data subject.

8. Rights of the data subject.

At any time, you, as the data subject, may exercise the following rights:

- pursuant to and under the conditions of Art. 15 of the GDPR, obtain confirmation whether personal data concerning you is being processed and, if so, access to your personal data and information relating to their processing;
- pursuant to and under the conditions of Art. 16 of the GDPR, obtain correction of inaccurate personal data concerning you and/or obtain the completion of incomplete data, including by providing an additional statement;
- pursuant to and under the conditions of Art. 17 of the GDPR, obtain deletion or, where possible, anonymization of your personal data: a) if they are no longer necessary for the purposes for which they were collected or subsequently processed; b) in case you withdraw your consent and there is no other lawful basis for processing; c) if you object to processing of your personal data carried out to pursue a legitimate interest of the Controller and there is no overriding legitimate interest to continue; d) your personal data have been processed unlawfully; e) your personal data must be deleted to comply with a legal obligation.

- ❑ pursuant to and under the conditions set out in Article 18 of the GDPR, obtain the restriction of processing in the following cases: a) you contest the accuracy of your personal data, for the period necessary for the Data Controller to verify the accuracy; b) your personal data have been processed unlawfully and you oppose their erasure, requesting that their use be restricted; c) your personal data, although no longer necessary for processing purposes, are required by you for the establishment, exercise or defense of legal claims; d) you have objected to processing, pending verification of whether the legitimate grounds of the Controller override your own.
- ❑ pursuant to and under the conditions set out in Article 19 of the GDPR, obtain that the Data Controller notifies each recipient to whom your personal data have been disclosed of any rectification or erasure or restriction of processing carried out, unless this proves impossible or involves a disproportionate effort;
- ❑ pursuant to and under the conditions set out in Article 20 of the GDPR, if the processing is based on a contract or consent and is carried out by automated means, receive without hindrance and in a structured, commonly used and machine-readable format the personal data concerning you to transmit them to another controller or - if technically feasible - obtain the direct transmission from the Data Controller to another controller;
- ❑ pursuant to and under the conditions set out in Article 21 of the GDPR, object, in whole or in part, for legitimate reasons related to your particular situation, to the processing of personal data concerning you, even if relevant to the purpose of collection;
- ❑ pursuant to and under the conditions set out in Article 22 of the GDPR, not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

To exercise the rights listed above, you may send a written communication using the contact details indicated above.

Furthermore, pursuant to and under the conditions set out in Article 77 of the GDPR and Articles 140-bis to 143 of Legislative Decree 30 June 2003, no. 196 and subsequent amendments, if you believe that your rights under the data protection legislation have been violated, you may lodge a complaint with the Data Protection Authority based in Rome - Piazza Montecitorio no. 121, website www.garanteprivacy.it, e-mail garante@gdp.it, certified e-mail protocollo@pec.gdp.it.

9. Updates

This notice may be updated. The current version is the one published on our website and/or made available before booking.