

PRIVACY POLICY

pursuant to art. 13 EU Regulation 2016/679

Dear Interested Party,

Meridiano Viaggi e Turismo S.p.A. has always considered the protection of the personal data of its customers and users, actual and/or potential, to be of fundamental importance.

With this document (the "**Policy**"), we intend to renew our commitment to ensure that the processing of personal data, collected through the [https://meridianocongress.com/it/ website](https://meridianocongress.com/it/website) (the "**Site**"), carried out by both automated and manual means, takes place in full compliance with the protections and rights recognized by Regulation (EU) 2016/679 ("**GDPR**" or the "**Regulation**") and Legislative Decree 196/2003 ("**Privacy Code**"), as subsequently amended and supplemented, as well as by the other applicable regulations on the protection of personal data.

The term personal data refers to the definition contained in Article 4, paragraph 1 of the Regulation, i.e. "*any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*" (the "**Personal Data**").

This Information – drawn up on the basis of the principle of transparency and including all the elements required by art. 13 of the Regulation – aims to provide in a simple and intuitive way all the useful and necessary information so that the provision of personal data can take place in a conscious and informed manner and, if there is a change in circumstances, all the rights provided for by the GDPR can be exercised.

SUMMARY

PRIVACY POLICY..... 1
pursuant to art. 13 EU Regulation 2016/679..... 1
THE DATA CONTROLLER..... 3
DATA PROTECTION OFFICER 3
TYPE OF DATA PROCESSED..... 3

- a) Improve the browsing experience and control of the correct functioning of the Site..... 3
- b) To comply with current accounting and tax obligations, obligations provided for by law, by a Regulation, by EU legislation or by an Order of the Authority (in particular tax, anti-money laundering, banking and public security), as well as by supervisory and control bodies and for anonymous and aggregate statistical purposes..... 3
- c) To control illegal conduct and/or prevent other wrongdoing or fraud, as permitted by applicable law 3
- d) Ascertain, exercise or defend a right of the Data Controller in court and/or out of court. 4
- e) Direct marketing by the Data Controller. 4
- f) Sending - by automated means of contact (e.g.: sms, mms, e-mail, etc.) - promotional and commercial communications, advertising material relating to travel activities. 4
- g) Profiling purposes, i.e. analysis of habits, preferences, behaviours, interests inferred, by way of example, from online actions on sections of the Website in order to send you commercial communications..... 4
- h) Create an account and access the reserved area 4
- i) Contact us..... 5

SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA..... 5
PROCESSING METHODS..... 6
STORAGE TIMES..... 6
TRANSFER TO THIRD COUNTRIES..... 6
FUNDAMENTAL RIGHTS OF THE DATA SUBJECT AND HOW TO EXERCISE THEM..... 7

THE DATA CONTROLLER

The company that will process your Personal Data for the purposes referred to in this Policy and which, therefore, will play the role of data controller, i.e. "the natural or legal person, public authority, agency or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data" is Meridiano Viaggi e Turismo S.p.A., with registered office in Via Mentana 2/b, 00185 - Rome (RM), P. IVA 00932741002 – C.F. 00800670580 (hereinafter the "**Data Controller**").

DATA PROTECTION OFFICER

The Data Controller, in order to facilitate relations with the data subjects, has appointed its own Data Protection Officer (the "**DPO**"), identifying SAPG Legal Tech S.r.l., with registered office in Corso Europa n. 7, 20122 - Milan.

As provided for by Article 38 of the GDPR, the Data Subject may freely contact the DPO for all matters relating to the processing of Personal Data and/or if he/she wishes to exercise his/her rights as provided for in this Policy, by sending a written communication to the e-mail address: dpo.privacy@sapglegal.com.

TYPE OF DATA PROCESSED

The Personal Data collected by the Data Controller – in order to pursue the purposes indicated below – may include: name, surname, e-mail address, tax code, telephone number. Personal Data may be processed according to the purposes and related legal bases set out below.

a) Improve the browsing experience and control of the correct functioning of the Site

The computer systems and software procedures used to operate the platform acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes, by way of example, your information relating to: IP addresses, operating system, access time, time spent on the individual page, internal path analysis, other parameters relating to the operating system and the IT environment.

These technical/IT data are collected and used exclusively in an aggregate and non-identifying manner and could be used to ascertain responsibility in the event of hypothetical computer crimes against the platform.

The processing will be legally based on the legitimate interest of the Data Controller in the better functioning of its systems, the optimization and improvement of your browsing experience, the prevention of fraudulent activities and the improvement of the security of the platform (**Article 6, paragraph 1, letter f) of the GDPR**).

b) To comply with current accounting and tax obligations, obligations provided for by law, by a Regulation, by EU legislation or by an Order of the Authority (in particular tax, anti-money laundering, banking and public security), as well as by supervisory and control bodies and for anonymous and aggregate statistical purposes.

The legal basis for this processing is compliance with legal obligations (**Art. 6, paragraph 1, letter c) of the GDPR**).

c) To control illegal conduct and/or prevent other wrongdoing or fraud, as permitted by applicable law

The legal basis for this processing is the legitimate interest of the Data Controller (**Article 6, paragraph 1, letter f) of the GDPR**)

d) Ascertain, exercise or defend a right of the Data Controller in court and/or out of court.

The legal basis for the exercise or defence of a right of the Data Controller will be that of legitimate interest, referred to in **Article 6, paragraph 1, letter f), of the GDPR**.

e) Direct marketing by the Data Controller.

This term refers to the performance of promotional activities (both automated and traditional) of the services of your interest provided by the Data Controller. With regard to this direct marketing purpose, it should be noted that, by virtue of art. 6, paragraph 1, letter f), of the Regulation and art. 130, paragraph 4, of the Privacy Code (so-called "Privacy Code"). *soft spam exception*), the Data Controller may carry out this activity based on your legitimate interest, regardless of your explicit consent, as better explained in Recital 47 of the Regulation in which it is "*considered legitimate interest of the Data Controller to process personal data for direct marketing purposes*". This will be possible following the assessments carried out by the Data Controller regarding the possible and possible prevalence of your interests, fundamental rights and freedoms that require the protection of Personal Data over your legitimate interest in sending direct marketing communications. Moreover, you may lawfully object at any time (even partially) to the receipt of promotional communications, without this in any way prejudice the processing for other purposes.

Such processing, therefore, will be legally based on the legitimate interest of the Data Controller pursuant to **Article 6, paragraph 1, letter f) of the GDPR**.

f) Sending - by automated means of contact (e.g.: sms, mms, e-mail, etc.) - promotional and commercial communications, advertising material relating to travel activities.

This purpose of the processing is legitimized by your optional, free consent that can be revoked at any time (pursuant to **Article 6, paragraph 1, letter a) of the GDPR**).

g) Profiling purposes, i.e. analysis of habits, preferences, behaviours, interests inferred, by way of example, from online actions on sections of the Website in order to send you commercial communications.

The processing of your personal data for profiling purposes will take place, in case of consent, with data processing tools which, following cross-referencing, will create your commercial and behavioral profile on the web. This data processing tool relates the data collected during your browsing on the Site through the use of first-party profiling cookies accepted by you with the data collected by filling out the online *form*. In addition, such data and/or information will be associated with any and/or additional data and/or information already in our possession following your subscription to our services.

This purpose of the processing is legitimized by your optional, free consent that can be revoked at any time (pursuant to **Article 6, paragraph 1, letter a) of the GDPR**).

h) Create an account and access the reserved area

Your Personal Data will be used for the creation of the account in the reserved area.

This purpose of the processing is legitimized by your optional, free consent that can be revoked at any time (pursuant to **Article 6, paragraph 1, letter a) of the GDPR**).

i) Contact us

This data is also essential to manage your requests for assistance and/or information on the services offered, on existing contracts and payments.

This purpose of the processing is legitimized by the execution of pre-contractual measures or the contract to which you are a party (pursuant to **Article 6, paragraph 1, letter b) of the GDPR**).

The Data Controller, in order to proceed with generic marketing activities and with those for which you have expressed consent, will create a personal profile referring to you internally in its centralized management system (CRM). Any request for *opt-out* with respect to generic marketing activities and/or the revocation of any consents given do not entail the deletion of the aforementioned personal profile from the CRM, except for the exercise of your right to cancellation in the manner provided for in this information in the section entitled "Fundamental rights of the data subject". Once the above-mentioned retention terms have expired, the Personal Data will be destroyed, deleted or made anonymous, compatibly with the technical procedures of cancellation and *backup* and with the *accountability requirements* of the Data Controller.

Please note that consent is free, optional and revocable. Therefore, where only one consent is requested under any form, where it is given, it will be considered specific to that purpose and no other purpose that provides for the legal basis of consent.

If you have given consent (in whole or in part) to the processing of your Personal Data for the purposes set out above, you may at any time withdraw it in whole and/or in part without affecting the lawfulness of the processing based on the consent given before the withdrawal. Any withdrawal of consent will require the Data Controller to cease the processing of your Personal Data for these purposes. The procedures for withdrawing consent are very simple and intuitive: simply contact the Data Controller using the contact channels reported in this Policy.

SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA

Your Personal Data may be managed, on behalf of the Data Controller, exclusively by personnel expressly authorised to process the data (pursuant to Article 29 of the Regulation and Article 2-quarter *decies* of the Privacy Code) and by third parties expressly appointed as data processors (pursuant to Article 28 of the Regulation), in order to correctly carry out all the processing activities necessary to pursue the purposes referred to in this Privacy Policy. Information.

For purely explanatory purposes, some categories of subjects to whom your Personal Data may be communicated are reported:

- a) *commercial partners* of the Data Controller who provide services, as data processors or independent data controllers, for the purposes referred to in Article 6, paragraph 1, letter b) of the Regulation;
- b) third-party providers of assistance and consultancy services as data processors or independent data controllers, for the purposes referred to in art. 6, paragraph 1, letter b), of the Regulation;
- c) subjects and authorities whose right of access to Personal Data is expressly recognized by law, regulations or measures of competent authorities;
- d) transferees of a company or business unit, companies resulting from possible mergers, demergers or other transformations of the Owner's company.

If you wish to become aware of which subjects have come into possession of your Personal Data as a result of your relations with the Data Controller, you may contact the same by sending a communication to the e-mail address indicated below.

PROCESSING METHODS

The data collected will be processed using electronic or automated tools, computer and telematics, or through manual processing with logics strictly related to the purposes for which your Personal Data were collected and, in any case, in such a way as to guarantee the security of the same in any case. Your Personal Data will be stored in the form that allows your identification for the time strictly necessary for the purpose for which the data were collected and in compliance with the principles of proportionality and necessity.

STORAGE TIMES

Personal Data, falling within the scope of application of Article 2220 of the Civil Code, will be stored and processed for as long as the contractual relationship with the Data Controller exists and in any case for a period of 10 years from the termination of the contractual relationship itself, after which they will be deleted, without prejudice to the further storage of the same where necessary to comply with specific legal obligations, to measures of the Authority, for the collection of residual receivables and for the management of disputes, complaints and legal actions.

The storage times for some specific purposes are listed below:

1. Letter a), the data relating to electronic traffic will be processed: (i) for a period of twelve months from the date of communication for the purposes of ascertaining and suppressing crimes; (ii) for a period of seventy-two months for the purpose of detecting and punishing the offences referred to in Articles 51, paragraph 3-quarter, and 407, paragraph 2, letter a) of the Code of Criminal Procedure;
2. Letters b), c), and d) the data falling within the scope of Article 2220 of the Civil Code will be subject to a retention period of 10 years, the others will be subjected to a control and if not suitable for the pursuit of the purpose deleted within 12 months;
3. Letters e), f), and g), if the data subject has given consent for marketing and profiling purposes, his/her data will be processed for these purposes for 24 and 12 months;
4. Letter h), if the data subject has expressed consent for the creation of the reserved area, the data will be stored until the eventual end of the Data Controller's activities through the reserved area; if you have not accessed the reserved area for at least two years, your data will be deleted;
5. Letter i), if the data subject has provided a contact request, such data will be kept for a maximum period of 12 months from receipt of the request;

In any case, your Personal Data will be subject to periodic checks, not exceeding 12 months, aimed at assessing their relevance to the activities of the Data Controller; if your Personal Data is no longer relevant, it will be deleted immediately.

To ensure that your Personal Data are always accurate and up-to-date, in any case relevant and complete, please notify us of any changes to the Data Controller's contact details.

TRANSFER TO THIRD COUNTRIES

Your Personal Data will be processed by the Data Controller both within the territory of the European Union and outside the European Union and stored on servers located within the European Union.

In accordance with Article 49(1), letter c) of the Regulation, we inform you that your data may be communicated and processed by companies or professionals or service providers in general (third-party technical services, air carriers, transport companies in general, local tourist agencies, tourist guides and tourism

professionals, etc.), who may have residence and/or headquarters in non-EU countries where data protection laws may not be equivalent to those applied in the EU.

All necessary precautions will therefore be taken to ensure the total protection of your Personal Data by basing such transfer: a) on adequacy decisions of the recipient third countries expressed by the European Commission; b) on adequate guarantees expressed by the third party recipient pursuant to Article 46 of the Regulation (such as, for example, pseudonymization and minimization of the data transferred).

In any case, the Data Subject may request more details from the Data Controller if the Personal Data provided have been processed outside the European Union, requesting evidence of the specific guarantees adopted.

FUNDAMENTAL RIGHTS OF THE DATA SUBJECT AND HOW TO EXERCISE THEM

Pursuant to art. 15 of the Regulation, you have the right to obtain from the Data Controller confirmation as to whether or not Personal Data concerning you is being processed and, if so, to obtain access to the Personal Data and the following information: (i) purposes of the processing; (ii) categories of personal data; (iii) categories of recipients to whom the data have been or will be communicated; (iv) data retention period or the criteria used to determine such period.

You also have the right:

- pursuant to art. 16, to obtain from the Data Controller the rectification of inaccurate Personal Data concerning you, without undue delay;

- pursuant to art. 17, to obtain from the Data Controller the right to erasure of Personal Data concerning him/her;

- pursuant to art. 18, to obtain from the Data Controller the limitation of processing when one of the following cases occurs: a) the Data Subject contests the accuracy of the Personal Data, for the period necessary for the Data Controller to verify the accuracy of such Personal Data; b) the processing is unlawful and the Data Subject opposes the erasure of the Personal Data and instead requests that their use be limited; c) although the Data Controller no longer needs them for the purposes of the processing, the Personal Data are necessary for the Data Subject to ascertain, exercise or defend a right in court; d) the Data Subject has objected to the processing pursuant to art. 21, paragraph 1, pending verification of whether the legitimate reasons of the Data Controller prevail over those of the Data Subject;

- pursuant to art. 20, to receive the Personal Data concerning you in a structured, commonly used and machine-readable format;

- pursuant to art. 21, to object at any time to the processing of Personal Data concerning you carried out for marketing purposes (commercial communications sent by the Data Controller).

To exercise your rights, you can send a specific request to the following e-mail address: meridianovtspa@legalmail.it. We will notify you of receipt and follow up on your request without undue delay.

In any case, if you believe that the processing of Personal Data is contrary to the Privacy Legislation, you also have the right to lodge a complaint pursuant to art. 77 GDPR to the competent supervisory authority based on your habitual residence or the place where your rights were violated.

