

# **Privacy Policy**

In this page we will describe how we manage our website, https://sabortour.com as concerns processing the personal data of users who browse it. This notice is issued pursuant to article 13 of the Italian Legislative Decree n° 196/2003 – Personal data protection code for the visitors of the Alberto Bovo website, accessible by electronically through https://sabortour.com.

This notice complies with the directives laid down by the Personal data protection code (Italian Legislative Decree n° 196 dated 30 June 2003) and, in particular, articles 13, section 3 and 122, section 1 and with reference to the provision regarding the Identification of simplified methods concerning the notice and acquisition of consent to use cookies – 8 May 2014 (Published in the Official Gazette under n° 126 on 3 June 2014).

The most recent updated was issued pursuant to article 13 of Regulation EU 2016/679 dated 27 April 2016.

# The data controller and data protection officer (RPD or DPO)

The controller of the personal data processing of the users of Alberto Bovo, with registered office in C/ Braçal de Murteretes, 14 03110 Mutxamel, Alicante – Spagna, owner of the website https://sabortour.com.

To receive information regarding the present notice, users may contact the data Controller at any time, by proceeding as follows:

- Sending a registered letter with acknowledgement of receipt to the registered office of the data controller;

- Sending an email to info@sabortour.com

The users may also contact the data protection officer (RPD or DPO) of the data controller, whose contact information is indicated below: Alberto Bovo (info@sabortour.com).

# Purpose of processing

We collect your personal data for the following purposes:

- establishing communication with us, by responding to your request;
- providing information regarding the services offered by Alberto Bovo;

- for administrative and/or accounting purposes, or for meeting other law requirements;

- building a database to be exclusively used by Alberto Bovo, to analyse the customers' needs and thus provide the best service.

Submitting personal data for the aforementioned processing purposes is optional but necessary. If consent is granted, the user has the right to revoke the same at any time, through request to the data controller.

# **Cookie policy**

This website uses the following types of cookies (for more information cookies: <u>Wikipedia</u>) for the relative purposes:

- technical cookies to remember the consent (or not) of the user with respect to the information available, at the first access, on all pages of the website;

- cookies regarding advertisement services offered by Google, Facebook with the aim of knowing whether you browsed our website in the past and, whether it meets some conditions, and offering our services in form of advertisement;

- anonymous cookies regarding Google Analytics and Google Tag Manager services with the aim of knowing how you browse our website and potentially improve it;

In order to have further information with respect to how these companies use your data, below are the links to their privacy policies:

### - Google;

Information generated by Google Analytics cookies on the use of the website is thus submitted to Google and stored in its servers in the United States. Google uses this information to track and analyse how visitors use the website, and provide this data in aggregated form and never linked to your identity, through Analytics reports and its other information services (e.g. Google Trends).

Google could transfer this information to third parties should this be required by law or in case of entities processing this information on their own behalf; the privacy notice and use of Google Analytics data is available <u>here</u>.

If you do not want to be "tracked" through cookies, you can download the add-ons of the browser used; furthermore, some browsers allow anonymous browsing, regarding which no cookie will be installed.

# Advertising

At times we use – in anonymous form, i.e. not referring to the user's identity – information regarding your browsing activity in the https://sabortour.com website for advertising purposes when browsing search engines and other websites: this type of advertising is referred to as retargeting.

This information, collected using special cookies, is processed by Google Inc.

The Google Inc. and DoubleClick Inc. privacy policy regarding advertising is available here.

# Processing method and data storage times

The data controller will process the user's personal data manually and electronically, with logics strictly relating the purposes in question and with the aim of guaranteeing data security and confidentiality.

The Website user's personal data will be stored for the period of time strictly required to perform the main purposes outlined in the notice, or according to anything required to protect the interests of the user and of the data controller before civil authorities.

### Field of data communication and disclosure

The user's personal data may be disclosed to the data controller's employees and/or collaborators designated to manage the website and handle requests from users. These persons, who were duly trained by the data controller pursuant to article 29 of the regulation, will process the user's data solely for the purposes indicated in the present notice and in compliance with the provisions laid down by the applicable law.

The user's personal data may also be disclosed to third parties who may process the personal data on behalf of the data controller as the "external processing officers", such as, by way of example, providers of computer and logistics services functional to the operation of the website, providers of outsourcing or cloud computing services, professionals and consultants.

Users have the right to obtain a list of possible processing officers appointed by the data controller, by submitting a request to the data controller following due methods

# **Rights of the parties in question**

Users may exercise their rights guaranteed by the applicable law, by contacting the data controller as follows:

- Sending a registered letter with acknowledgement of receipt to the registered office of the data controller: C/ Braçal de Murteretes, 14 03110 Mutxamel, Alicante - Spagna

- by sending an email to info@sabortour.com

Pursuant to the applicable law, the data controller hereby wishes to make it known that the users have the right to obtain the indication (i) of the origin of the personal data; (ii) the purposes and methods of treatment; (iii) the logic applied in case of processing using electrical tools; (iv) the identification data of the data controller and processing officers; (v) of the entities or categories of entities to whom the data can be disclosed or who may encounter the data as the processing or designated officers.

Furthermore, the users have the right to obtain:

a) access to, update, correction or, when deemed necessary, supplementation of the data;

b) deletion, transformation into anonymous form or blocking data processed unlawfully, including data that does not require storage with respect to the purposes for which the data was collected or processed subsequently;

c) assurance that the persons to whom data was submitted or disclosed were notified of the operations pursuant to letters a) and b), even as concerns the content thereof, save for cases where such compliance proves to be impossible or entails deployment of means markedly disproportional to the right subject of protection.

Furthermore, the users have:

a) the right to withdraw consent at any time, if processing is based on their consent;

b) the right to data portability, i.e. the right to receive all personal data regarding them in a structured format, commonly used and readable by a computer device, the right to limit personal data processing and the right to delete ("right to be forgotten");

c) the right to fully or partly object, for legitimate reasons, to processing the personal data regarding them, even though relevant to the purpose of collection.

d) should they deem that the processing regarding them breaches the regulation, the right to file a complaint before a supervisory body (in the member state where they normally live, where they work or where the alleged breach occurred). The Italian supervisory body is the Italian Data Protection Authority, with offices in Piazza di Monte Citorio n° 121, 00186 – Rome (Data Protection Authority website).

The data controller shall not be held liable for the update of all links contained in the present notice. Thus, whenever a link does not work and/or is not updated, it should be acknowledged and accepted that reference shall always be made to the document and/or section of the internet website referred to in the link in question.