PRIVACY POLICY

INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13-14 OF REGULATION (EU) 2016/679

By means of this document (the "**Notice**"), provided pursuant to Regulation (EU) 2016/679 (hereinafter the "**GDPR**") and the applicable personal data protection legislation, **Frigerio Viaggi S.r.l.** ("**Frigerio Viaggi**" or the "**Data Controller**") wishes to inform visitors ("**Data Subjects**" or "**Data Subject**") of the websites https://www.frigerioilgruppo.com and https://www.frigerioviaggi.com (the "**Site**"), as well as the recipients of its electronic communications, of the purposes and methods of processing of the personal data ("**Personal Data**") collected through the various features and services available on the Site.

■ Data Controller and Data Protection Officer

Frigerio Viaggi S.r.l., Via Ambrogio Viganò, 5, 20833 Giussano (MB), Italy, VAT No. 00851420968, Tax Code 07215280152, e-mail/phone dpo@frigerioviaggi.com / 0362350001.

Frigerio Viaggi has appointed a Data Protection Officer ("**DPO**"), who can be contacted at the following e-mail address: dpo@frigerioviaggi.com

■ Purposes, legal basis of processing and retention period of Personal Data

a) Site browsing and security: collection of connection and log data (e.g. IP address, user-agent, pages visited) to ensure the secure operation of the Site, prevent abuse and support diagnostic analysis.

Legal basis: legitimate interest of the Data Controller (Art. 6(1)(f) GDPR). **Retention:** for as long as necessary to ensure security and carry out diagnostic analysis.

For further information on retention periods and on the use of cookies, please refer to the Site's Cookie Policy.

b) Management of unsolicited job applications: the Personal Data voluntarily provided by the Data Subject through the "Work with us" section of the Site are processed exclusively to manage unsolicited applications or applications in response to open positions, to assess the professional profile, skills and experience declared, and to carry out the selection process and contact the candidate. Personal Data are processed in compliance with the principles of relevance and data minimisation and are not used for purposes other than those related to personnel selection.

Legal basis: performance of pre-contractual measures taken at the request of the Data Subject (Art. 6(1)(b) GDPR).

Retention: data are kept for the period strictly necessary to manage the application and, in any case, for no longer than 12 months from receipt, unless otherwise required by law or requested by the Data Subject.

c) Newsletter and marketing communications: collection of contact data for sending informational and promotional communications about the services of Frigerio Viaggi and/or the Frigerio Viaggi Group. The consent referred to in this letter is separate from and independent of the consents referred to in letters d) and e): failure to grant the latter does not affect subscription to the newsletter.

Legal basis: consent of the Data Subject (Art. 6(1)(a) GDPR).

Retention: until consent is withdrawn.

d) Monitoring of interactions with e-mail communications (tracking pixels): subject to the Data Subject's specific, free and independent consent, newsletters and marketing communications sent by the Data Controller may contain tracking pixels and tracked links, which make it possible to detect whether the message has been opened, the date and time of opening, the number of openings, clicks on the links contained in the message, as well as technical information on the device, e-mail client and connection used (e.g. IP address, user-agent). Such data are processed, with reference to the individual recipient, to measure the effectiveness of campaigns, verify their correct delivery and adapt their content, frequency and timing; where the Data Subject has also given the consent referred to in letter e), the same information may contribute to profiling activities.

Consent to monitoring is separate from and independent of consent to receive marketing communications under letter c): failure to grant consent to tracking, or its subsequent withdrawal, does not in any way affect the possibility of subscribing to and continuing to receive communications. **The Data Subject may withdraw consent at any time and without formalities, without needing to unsubscribe from the service**, via the dedicated link at the bottom of each communication or by writing to dpo@frigerioviaggi.com. Following withdrawal, the tracking pixel will no longer be included in subsequent communications.

Legal basis: consent of the Data Subject (Art. 122 of Legislative Decree 196/2003 and Art. 6(1)(a) GDPR), which may be withdrawn at any time pursuant to Art. 7(3) GDPR.

Retention: data relating to interactions with individual communications are kept for no longer than 12 months from each interaction and, in any case, until consent is withdrawn; after this period they are deleted or kept in aggregated and anonymous form for statistical purposes only.

e) Profiling activities: subject to the explicit consent of the Data Subject, the Data Controller may process Personal Data, in particular browsing data, data collected through cookies and similar technologies, information on the travel services requested or purchased and, where the Data Subject has given the consent referred to in letter d), data relating to interactions with e-mail communications, in order to analyse browsing and purchasing habits, preferences and behaviour. This profiling activity is aimed at personalising the content of the Site, improving the user experience and sending targeted commercial and promotional communications consistent with the interests expressed by the Data Subject. Consent to profiling is separate from and independent of the consent referred to in letter c).

Legal basis: consent of the Data Subject (Art. 6(1)(a) GDPR).

Retention: data used for profiling purposes are kept for no longer than the period indicated in the Cookie Policy and, in any case, until the Data Subject withdraws consent.

f) Analytics and statistics: the Data Controller processes Personal Data, in aggregated or pseudonymised form, in order to carry out statistical analyses on the use of the Site, monitor its proper functioning, assess page performance and improve the quality of the services offered and the users' browsing experience. Such processing may be carried out using technical analytics cookies or analytics tools, including those provided by third parties. Further information on the characteristics of the cookies used, their functions and how to manage or withdraw preferences expressed is available in the Cookie Policy, which can be consulted on the Site.

Legal basis: legitimate interest of the Data Controller (Art. 6(1)(f) GDPR) or consent of the Data Subject where required for third-party cookies (Art. 6(1)(a) GDPR). **Retention:** for further information, please refer to the Cookie Policy.

g) Protection of rights and legal obligations: processing of Personal Data to comply with legal obligations, for defence in legal proceedings or to respond to requests from public authorities.

Legal basis: compliance with a legal obligation (Art. 6(1)(c) GDPR) and/or legitimate interest of the Data Controller (Art. 6(1)(f) GDPR).

Retention: until the end of the applicable limitation period.

h) Handling of requests: the Personal Data voluntarily provided by the Data Subject through the Site's contact form are processed exclusively to follow up on the requests for information, assistance or contact submitted, to manage communications with the Data Subject and respond to them, and to carry out the strictly related organisational and administrative activities. Providing the data is necessary in order to process the request; failure to provide them may make it impossible to respond.

Legal basis: performance of pre-contractual measures taken at the request of the Data Subject (Art. 6(1)(b) GDPR).

Retention: Personal Data are kept for the time strictly necessary to handle the request and, thereafter, for any period required by legal obligations or for the protection of the Data Controller's rights.

■ Types of Personal Data

Depending on the purpose, the Personal Data processed are as follows:

Browsing data: (e.g. IP address, data relating to the connection, the devices used and the way the Site is browsed, processed to ensure its proper functioning and security and for statistical purposes)

Identification and contact data: (e.g. first name, surname, date of birth, tax code, address of residence or domicile, e-mail address and telephone number, necessary to handle the Data Subject's requests, to organise and provide travel services, and to carry out pre-contractual and contractual activities)

Data collected through cookies and similar technologies: information relating to the user's browsing and preferences, as further specified in the Cookie Policy, to which reference is made for details of the categories of cookies used and their retention periods.

Data processed for informational and marketing communications: contact data voluntarily provided by the Data Subject (such as e-mail address and telephone number) for sending newsletters and promotional or informational communications relating to the services offered, subject to specific and free consent.

Data relating to interactions with e-mail communications: (e.g. opening of the message, date and time of opening, number of openings, clicks on links, technical information on the device and e-mail client), processed exclusively with consent for the purposes referred to in letter d).

■ Categories of Data Subjects

The processing activities concern the following categories of Data Subjects:

- Data Subjects who browse the Site, even without filling in any form/section;
- Data Subjects who use the services of the Site by filling in contact or request forms;
- Data Subjects who have given their consent to subscribe to newsletters or to receive promotional communications, to the monitoring of interactions with e-mail communications and/or to profiling.

■ Methods of processing Personal Data

Personal Data are processed electronically, adopting appropriate technical and organisational security measures to ensure the protection of Personal Data and to prevent unauthorised access.

■ Recipients of Personal Data

Personal Data may be shared with the following categories of recipients:

a) authorised Frigerio Viaggi personnel, duly instructed, including with regard to security measures and confidentiality obligations;

b) external consultants used by Frigerio Viaggi to perform the services offered on the Site, such as IT, legal and tax consultants, etc.;

c) service providers used by Frigerio Viaggi in various capacities (including providers of marketing automation and e-mail delivery platforms), duly appointed as data processors;

d) any companies of the Frigerio Viaggi Group involved in the services;

e) parties involved in organising and providing the travel and tourism services requested by the Data Subject, such as, by way of example, hotels, airlines and other transport and tourism service providers;

f) competent authorities or other entities as required by law.

■ Transfer of Personal Data outside the EU

Some service providers used by the Site may involve the transfer of data to third countries, including the United States. Such transfers take place in compliance with Articles 44 et seq. GDPR, by means of:

- Standard Contractual Clauses approved by the European Commission;
- the EU–US Data Privacy Framework for participating providers (e.g. Google LLC), based on the European Commission's adequacy decision of 10 July 2023;
- other appropriate safeguards in accordance with applicable legislation.

For further information on the safeguards adopted, you may contact the Data Controller by writing to: dpo@frigerioviaggi.com

■ Cookies and tracking technologies

The Site may use technical, analytics and profiling cookies, including third-party cookies, as well as analytics and protection tools. Non-technical cookies are installed only with the explicit consent of the Data Subject, managed through the banner and the preferences indicated. Cookies and similar technologies may also be used to personalise content and measure the effectiveness of the services offered by the Site, without ever compromising the security of Personal Data. For further information on the types of cookies, their purposes and how to manage preferences, please refer to the Cookie Policy available on the Site.

E-mail communications sent by the Data Controller may also contain tracking pixels, tools comparable to cookies, which are used exclusively with the Data Subject's consent, as described in letter d) of this Notice.

■ Rights of the Data Subject

In relation to the processing described in this Notice, the Data Subject may exercise the rights set out in Articles 15 to 22 GDPR, and in particular the following rights:

- **Right of access** (Art. 15 GDPR): the right to obtain confirmation as to whether or not Personal Data concerning the Data Subject are being processed and, where that is the case, access to the Personal Data.
- **Right to rectification** (Art. 16 GDPR): the right to obtain without undue delay the rectification of inaccurate Personal Data concerning the Data Subject and/or the completion of incomplete data.
- **Right to erasure (right to be forgotten)** (Art. 17 GDPR): the right to obtain the erasure of Personal Data concerning the Data Subject, unless processing is necessary to comply with a legal obligation.
- **Right to restriction of processing** (Art. 18 GDPR): the right to obtain restriction of processing where the data are inaccurate or on other legitimate grounds.

- **Right to data portability** (Art. 20 GDPR): the right to receive Personal Data in a structured, machine-readable format.
- **Right to object** (Art. 21 GDPR): the right to object, at any time, to the processing of Personal Data on legitimate grounds.
- **Right not to be subject to automated decision-making** (Art. 22 GDPR), including profiling.
- **Right to withdraw consent** (Art. 7(3) GDPR): the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; withdrawal of the consent referred to in letter d) does not entail unsubscription from the newsletter.
- **Right to lodge a complaint** with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali – www.garanteprivacy.it).

To exercise these rights, you may contact the Data Controller and the DPO at the following address: dpo@frigerioviaggi.com

■ Updates to this Notice

This Notice may be subject to updates. The published version indicates the date of the last update: **23 October 2026**. Please consult this Notice periodically.