

Dolomite Treks' data protection statement

Personal data protection statement

Introduction

Pursuant to articles 13 and 14 of the fundamental EU data protection regulations 2016/679 (or general regulations on data protection - GDPR) and in general accordance with Italian and European standards applicable to the data protection field, Dolomite Treks hereby supplies the following personal data protection and processing information.

1) DATA CONTROLLER

Dolomite Treks is a registered trademark used for business purposes as specified under point 4. Isabelle Johnson and Anna Vecellio del Monego (hereafter Dolomite Treks) jointly own and are responsible for data processing pursuant to the provisions of Art. 26 of GDPR. The agreement which determines both the ends and means of data processing, in conformity with paragraph 1 of Art. 26 of GDPR, is available to interested parties as a footnote to this data protection and processing statement or by [clicking on this link](#).

Isabelle Johnson
Via Giau, 3
32040 Valle di Cadore (BL)

Anna Vecellio Del Monego
Via Valle Ansiei, 51
32041 Auronzo di Cadore (BL)

VAT number IT01058020254
Tax code: JHNSLL67P48Z114I

VAT number IT 01140950252
Tax code: VCLNNA79M46A501V

Tel: +39 349 317 9002
e-mail: info@dolomitetreks.com
PEC:
isabellem.johnson@postacertificata.com

Tel: +39 380 649 8638
e-mail: info@dolomitetreks.com
PEC: anna.vecellio@pec.it

For contacts specifically related to personal data protection, including those relating to exercising the rights specified in point 10, write to the following email address:
info@dolomitetreks.com

2) Third party working relationships

When we work with our suppliers and use third party services, we guarantee that these are contractually required to adopt the same privacy/security standards used by us and we ensure that these are abided by. These third parties acting as personal data processors guarantee that the data received by Dolomite Treks is not memorised or used for purposes other than those contractually agreed to.

It may happen that we are obliged to transfer your data to third parties resident outside Europe (EEA). The EEA (European Economic Area) is made up of European Union countries, Switzerland, Iceland, Liechtenstein and Norway. These nations have adopted the same personal data processing laws. Data transfer takes place when servers (i.e. the site at which data is physically stored) or supplier headquarters are located in non EEA countries. In the event that SiMedia is obliged to transfer data to a country outside the European

Economic Area (EEA) we accept full responsibility for the data being processed in accordance with suitable security norms.

3) Type of data processed

All types of processing guarantee respect for the data processed and privacy. This general data and information is saved in server databases and as logfiles. Unique surfing experiences requires the use of technical data essential to its functioning.

The personal data which this website deals with autonomously or via third parties includes:

- a) browser type and version used;
- b) operating system;
- c) the website from which the system accesses our website (the so-called referrers);
- d) the sub-websites which the system accesses from our website;
- e) website visit date and time;
- f) IP address;
- g) other data and related information;
- h) cookies;
- i) usage data;
- j) personal data via the contact form.

Full information on each type of personal data processed will be supplied in the relevant sections of this privacy policy or, as appropriate, in explanatory texts made public prior to data collection.

Personal data can be voluntarily supplied by users and will be processed in conformity with the provisions of Art 6, paragraph 1, section b of the GDPR or, in the case of website use data, collected automatically while surfing on this website.

Any cookies or other tracking tools whatsoever used by this site or third party service suppliers accessed via this site serve to supply services required by users or any additional purposes set out in this document and, where required, in the cookie policy.

Your personal data will be processed both manually and telematically, but primarily via automated means and processes honed on the basis of pre-set objectives. Such cases use databases and IT platforms, in particular, and these may be managed by us or by third parties.

4) PROCESSING PURPOSES

Your personal data may be processed in accordance with the following objectives:

- ✓ finalising contracts and contractual obligations (the responsibility of and for the benefit of the data processor), i.e. for purposes closely bound up with the management of client contacts including formalities and administrative and accounting operations (e.g. information collection prior to the signing of a contract, including for pricing purposes; the performance of base obligations deriving from contracts with clients; implementing the payment method agreed; operational and administrative requirements; requirements relating to payment checks and related phases; access to all services including interactive services, site offers; collecting the information required in the event of complaints and /or service related information requests; resolving disputes - contractual non-fulfilment; reminders; transactions; debt collection; arbitration; litigation, etc.);

- ✓ fulfilment of legal obligations and the requirements of bodies tasked with legal obligations and supervisory and auditing bodies;
- ✓ market research and customer satisfaction enquiries including those carried out by specialist firms in personal or telephone enquiries, questionnaires, online surveys and for the purposes of offering special products and services (marketing);
- ✓ where interested parties consent to it, performing automated processes to analyse their preferences, habits and/or consumer choices for the purposes of offering the former tailor-made products or services (profiling).

5) Data processing type and site

The following personal data categories can be subject to processing:

1. name, surname, date of birth, address;
2. tax code and/or VAT code;
3. sensitive data as required by article 9 of the GDPR;
4. telephone number/email address and other contact data including in the event of third party contacts as required;
5. site of contractual service implementation;
6. data relating to contractual obligations;
7. payment methods.

As regards the above, your personal data will be processed for the following purposes:

- a) fulfilling contractual obligations between parties and supplying the information and services requested by interested parties as required for the performance of our reciprocal contractual obligations;
- b) sending active service information via email and/or text message as with the use of other means of communication (such as confirming bookings) as required for the performance of our reciprocal contractual obligations and/or based on user consent;
- c) receiving payments from you or transferring refunds as required for the performance of our reciprocal contractual obligations;
- d) allowing user profiles to be personalised on our platforms - based on user consent.

Data is processed at Dolomite Treks' addresses and at all other sites at which those involved in processing are located. Depending on user location, data may be transferred to other countries (including outside the EU and the EEA). For additional information on data processing locations, contact Dolomite Treks.

6) Legal basis for processing and mandatory transfer

Art. 6 paragraph 1 letter a) of the GDPR is the legal basis for Dolomite Treks' processing operations for which we obtain consent for a specific type of processing. If the processing of personal data is necessary for the fulfilment of a contract to which a user is party, such as processing operations required for the provision of goods and other services or fees, processing is based on art. 6, paragraph 1, point b) of the GDPR. The same applies to the processing operations required for the implementation of pre-contractual operations such as product or service information requests. If our company is subject to a statutory obligation requiring personal data processing, for example to comply with tax obligations, processing is based on art. 6, paragraph 1, point c) of the GDPR. In rare cases, personal data processing may be necessary to protect the vital interests of those concerned or other individuals. This would be the case, for example, if a Dolomite Treks client were injured and

the latter's name, age, health insurance information or other vital information were to be disclosed to a doctor, hospital or third party in which case processing is based on art. 6, paragraph 1, point d) of the GDPR. Finally, processing operations may be based on art. 6 paragraph 1, point f) of the GDPR. Processing operations that do not fall under any of the above legal grounds occur where processing is required for the purposes of safeguarding a legitimate Dolomite Treks or third party interest, provided that the interests and fundamental rights and freedoms of the interested party do not prevail. These processing operations are permitted to the extent that they are specifically cited in European legislation.

7) Collecting, processing, and storing data

User data is collected and thus the data in question is both supplied us by interested parties and arising from the use of contracted services.

Data will be processed:

- a) using manual and automated systems;
- b) by individuals authorised to do so;
- c) taking appropriate steps to ensure data confidentiality and prevent access to it by third-party and non-authorized persons.

With specific reference to the purposes of the processing provided for in paragraph 4 above, personal data is processed as follows:

- ✓ using automated call or call communication systems;
- ✓ e-mail, fax, Short Message Service (SMS) or any other type of message;
- ✓ by phone by a co-worker or by post.

With regard to the processing purposes specified in paragraph 4, personal data will be stored for the duration of the contract, and subsequently solely to the extent that it is required for contractual obligation fulfilment and for the implementation of any legal measures arising, as well as for contractual protection requirements related to or resulting from the contract.

With regard to the processing purposes cited in paragraph 4, data processing will terminate at the latest - that is, if the interested party does not give prior consent - within 5 years of contract fulfilment.

As regards the processing purposes specified in paragraph 4, data processing may continue until consent is withdrawn, but in any event, no more than 5 years after contract fulfilment or consent renewal.

No automated decision-making processes will be used and the potential for profiling (provided corresponding consent is granted) remains unchanged.

8) Data Disclosure

We do not share the information provided us, including personal information, with third parties, except where:

- Required by a third-party provider for contract fulfilment purposes or to simplify or improve our services (for example, in the event of costs or credits for platform services);
- we use analysts and search engines to improve and optimise our platforms;

- sections of our platforms are used in APIs or widgets displayed on our business partners' websites. In such cases, some of users' public profile information may be visible on these sites.

User data, including personal information, and cookie information sent and received from our business partners may be associated, in accordance with applicable laws and, if necessary, with your consent. This information and the combined information may be used for the above purposes.

9) Continuity and co-responsibility for personal data processing

Dolomite Treks processing in the performance of its professional and commercial activities and where processing is necessary for the fulfilment of a contract to which users are party (art. 6, paragraph 1, point b) of the GDPR) is also permitted where joint and co-responsibility for the processing itself applies.

Specifically, to fulfil its contractual obligations, Dolomite Treks works with FUNActive, with an exchange of professional services taking place. Personal data processing takes place in strict accordance with art. 26, paragraph 1 of the GDPR. Pursuant to the above mentioned personal data processing and protection law, the joint owners and those jointly responsible for processing hereby make the agreement below on the protection and processing of personal data available to you via this [link](#).

10) Rights of interested parties

(a) Right to processing confirmation

Any user subject personal data processing has the right, as guaranteed by European directives and law, to require the controller to confirm that his/her personal data is actually being processed. Those wishing to avail themselves of this right can contact the controller at any time.

b) Right to information

Any user subject to personal data processing has the right, as guaranteed by European directives and law, to free information from the controller at any time on the processing of personal data relating to him/her and to a copy of the stored data. In addition, the European Regulatory Authority and guidelines stipulate that notices made available in such cases should comprise the following information:

- ❖ Processing purpose;
- ❖ types of personal data processed;
- ❖ recipients or categories of recipients to which the personal data processed has been or may be sent, with particular reference to recipients based in non EU countries, including international organisations;
- ❖ where possible, the expected personal data storage period and, where this is not possible, the storage period definition criteria used;
- ❖ users' right to have their personal data rectified or deleted, limitations on processing by controllers or the right to object to such processing;
- ❖ access to a right to appeal to a competent authority in this matter;
- ❖ in the event that any personal data processed was not supplied by the interested party, thoroughgoing information on the origin of the data;
- ❖ the potential for data to be processed in an automated manner with specific reference to profiling activities, in accordance with Art 22, paragraph 1, and 4 of the GDPR and, at

least in such cases, due and appropriate information is to be provided regarding the processing logic involved as well as the scope and impact of this particular type of processing on users' personal data.

In addition, interested parties have the right to access information on whether personal data has been transmitted to a third country or an international organisation. Where this has taken place, users have the right to information on the use of appropriate security guarantees in relation to the data transfer concerned.

Those wishing to avail themselves of this right can contact the controller at any time.

c) Right to rectify

All interested parties whose data has been processed have the right, as guaranteed by European directives and laws, to request the immediate amendment of incorrect personal data concerning them. This includes the right to request the completion of personal data and apparently incomplete data, including through a supplementary declaration, taking into account processing purpose.

Those wishing to avail themselves of this right can contact the controller at any time.

d) Right to be erased (right to be forgotten)

All interested parties whose data has been processed have the right, as guaranteed by European directives and laws, to require the controller to immediately delete personal data concerning them, provided that one of the following motives exists and that processing is not required:

- ❖ the personal data acquired and processed was stored for purposes no longer necessary and valid;
- ❖ the interested person revokes consent, in accordance with which the processing of the data took place pursuant to art. 6 paragraph 1 point a) of the GDPR or Art. 9 paragraph 2 point a) of the GDPR and, at the same time, the legal basis for further processing is absent;
- ❖ the interested person is opposed to data processing under Art. 21 paragraph 1 of the GDPR and there are no previous and legitimate reasons for such processing, or the interested party opposes the processing of the data under Art, 21 paragraph 2 of the GDPR;
- ❖ the personal data of the interested party has been processed illegally or inappropriately;
- ❖ deletion of personal data is necessary to comply with a legal obligation under EU or Italian law to which the controller is subject;
- ❖ the personal data processed was collected in connection with IT services offered under Art. 8, paragraph 1 of the GDPR.

Where any of these conditions apply and where interested parties wish to initiate the deletion process for the personal data held by Dolomite Treks, users can contact the controller at any time. Dolomite Treks will immediately comply with such cancellation requests.

In the event that interested parties' data has been made public by Dolomite Treks, who is responsible for processing under Article 17, paragraph 1 of the GDPR and therefore subject to the obligation to delete the data processed, Dolomite Treks undertakes to inform others responsible for the processing of the data involved in the personal data deletion request, in

accordance with the available technology and the cost of implementing appropriate measures, including technical ones.

Those wishing to avail themselves of this right can contact the controller at any time.

(e) Right to restrict processing

All interested parties whose data has been processed have the right, as guaranteed by European directives and regulatory bodies, to request that the controller limit processing in the event that at least one of the following conditions apply:

- ❖ personal data accuracy is disputed for a period of time sufficient for the data controller to verify the accuracy of the personal data in their possession;
- ❖ processing is illegal and the interested party refuses to agree to deletion of his or her personal data, preferring limitations on its use;
- ❖ the controller no longer needs to store the personal data for processing purposes but the interested party requires this in order to assert, exercise or defend their legal rights;
- ❖ the interested parties have objected to processing, pursuant to Article 21 paragraph 1 of the GDPR, and it is not yet clear whether legitimate processing grounds take precedence over the rights of the interested party.

In the event that one of these conditions applies, and the interested party intends to request limitations on the processing of the personal data stored by Dolomite Treks, such requests should be sent to a Dolomite Treks employee who will provide for data processing limitations.

f) Right to portability

All interested parties whose data has been processed have the right, as guaranteed by European personal data processing directives and laws, to obtain personal data which has been made available to a controller, in a structured, consistent format that can be read with IT tools. In addition, the interested party has the right to transfer this data, without hindrance from the transferee, to another processing controller provided that this takes place in accordance with Art. 6, paragraph 1 of the GDPR or Art. 9, paragraph 2 point a) of the GDPR as well as with a contract under Art. 6, paragraph 1, point b) of the GDPR and that processing takes place using automated procedures, provided that this is not required for the fulfilment of a public interest or exercise of public authority obligation.

In addition, as regards the right to data portability under Art. 20, paragraph 1 of the GDPR, interested parties have the right to ensure that personal data is transmitted directly from one controller to another, to the extent that this is technically feasible and does not adversely affect the rights and freedom of others.

Those wishing to avail themselves of this right can contact the controller at any time.

g) Right of opposition

All interested parties whose data has been processed have the right, as guaranteed by European directives and the regulatory authorities, to object at any time, and for reasons arising from a specific situation, to the processing of their personal data relating to art. 6, paragraph 1, point e) of the GDPR. This right also applies to profiling based on these premises.

In the event of opposition, Dolomite Treks will no longer process personal data, unless we are able to establish valid legitimate reasons for processing that overrides the interests,

rights and freedoms of the interested party, or processing serves the purpose of upholding or defending the interested party's legal claims.

Where personal data processing by Dolomite Treks is for direct advertising purposes, interested parties have the right to object at any time to the processing of their personal data. This also applies to profiling, to the extent that it is associated with direct advertising. If you object to Dolomite Treks processing your personal data for direct marketing purposes, Dolomite Treks will undertake to cease processing for such purposes.

In addition, interested parties are entitled, for reasons arising from a specific situation, to object to the handling of personal data concerning them by Dolomite Treks for scientific or historical research or statistical purposes pursuant to Art. 89 paragraph 1 of the GDPR, unless such processing is required for the fulfilment of a public interest obligation.

Those wishing to avail themselves of this right can contact the controller at any time. Interested parties are also free, in the context of the use of IT firm services, 2002/58/EC Directive notwithstanding, to exercise their right of opposition via automated procedures using technical specifications.

h) Automated decisions including profiling

All interested parties whose data has been processed have the right, as guaranteed by European directives and laws, not to be subject to a decision based solely on automated processing, including profiling, which significantly or legally affects them unless such a decision: (1) is required for the purposes of drawing up or fulfilling a contract between the interested party and the controller or (2) is permitted by EU laws or those of the member state the controller is subject to or processing is subject to legislation which provides for appropriate measures to safeguard the rights and freedoms as well as the legitimate interests of interested parties or (3) with the explicit consent of the interested party.

If such a decision (1) is required for contractual or contract fulfilment purposes between the interested party and the controller or (2) was taken with the explicit consent of the interested party, Dolomite Treks will take appropriate steps to safeguard the rights, freedom and legitimate interests of interested parties, including the right to express their views to an employee of the controller and thus appeal the decision.

Those wishing to avail themselves of this right can contact the controller at any time.

(i) Right to revoke consent to data protection

All interested parties whose data has been processed have the right, as guaranteed by European directives and laws, to withdraw consent to personal data processing at any time.

Those wishing to avail themselves of this right can contact the controller at any time.

JOINT OWNERSHIP AGREEMENT Art. 26 GDPR 679/16
Processing of personal data

As set out in point 1) of this privacy statement, the parties to this agreement hereby notify users that Dolomite Treks is a registered trademark used for business and professional service provision purposes by Isabelle Johnson and Anna Vecellio Del Monego.

The parties to this agreement are:

Isabelle Johnson
Via Giau, 3
32040 Valle di Cadore (BL)

Anna Vecellio Del Monego
Via Valle Ansiei, 51
32041 Auronzo di cadore (BL)

VAT number IT01058020254
Tax Code JHNSLL67P48Z114I

VAT number IT 01140950252
Tax Code VCLNNA79M46A501V

Phone: +39 349 317 9002
e-mail: info@dolomitetreks.com
PEC:
isabellem.johnson@postacertificata.com

Phone: +39 380 649 8638
e-mail: info@dolomitetreks.com
PEC: anna.vecellio@pec.it

Art. 26 stipulates that when two or more data processing controllers jointly determine processing purposes and means, they are joint controllers and transparently determine their compliance responsibilities with the obligations arising from this regulation, via an internal agreement, with particular regard to the rights of interested parties, and their respective responsibilities as regards notifying users of information pursuant to Articles 13 and 14, unless and to the extent that their responsibilities are determined by EU laws or those of the member state to which they are subject. This agreement may constitute a point of contact for interested parties.

Interested parties can exercise their rights, irrespective of the provisions of the agreement, pursuant to EU Regulations as regards each controller.

The principal activities of the parties to the agreement are:

- a. personalized travel consultancy services;
- b. customer assistance;
- c. trekking accompaniment;
- d. organising overnight stays;
- e. travel packages and related services as required by EU Regulation 2015/2302, via D. lgs No. 62 of 21 May 2018 (Tourism Code);
- f. various support activities.

As regards data processing, the parties to this agreement undertake to share means and purposes, structures and resources, and specifically:

- a. customer and supplier databases;
- b. the databases of service providers external to the joint owners;
- c. personal data purposes, each as regards the specific activities performed;
- d. personal data processing methods and systems;
- e. data storage policies;
- f. the style and manner of privacy statement notification pursuant to art. 13 of GDPR;

- g. consent management procedures;
- h. communications management and appointments, art. 28 GDPR;
- i. keeping processing records, art. 30 of GDPR;
- j. procedures in the event of data transfer outside the EU;
- k. personal data profiles and security policies and data breach procedures;
- l. management of interested party rights processes;
- m. joint personal data collection protection procedures through joint storage and management of a Data Processing Manual.

This joint ownership agreement relates to data processing and its subject is the processing of all data already present in all archives both paper and computerised, and all data that acquired in future.

The joint owners share decisions on the purpose and manner of data processing and undertake, together, to provide for and keep up to date all Regulation (EU) 2016/679 requirements and personal data protection laws. Specifically, with this agreement, the joint owners agree that personal data in their archives, both paper and computerised, as well as future data, will be processed for contract obligation fulfilment, pre-contractual provisions and compliance with EU laws and regulations, as well as official provisions legitimised by legal and supervisory and control bodies.

Sharing interested party rights procedures

Pursuant to Art. 15 of the GDPR, interested parties can access their data, require it to be amended and updated, if it is incomplete or erroneous, request its cancellation if data collection violated laws or regulations and oppose processing for legitimate and specific reasons.

These rights can be exercised by contacting individual data processors.

The parties agree that, under art. 26, paragraph 3, of EU Regulation 2016/679, irrespective of the provisions of this agreement, interested parties will be able to exercise their rights with and against each controller.