



## **Information on the processing of personal data**

(Article 13 Legislative Decree n. 196 of 30 June 2003)

### **TRAVEL AGENCIES, TOUR OPERATORS and SUPPLIERS**

In compliance with the provisions of Legislative Decree 196/03 “Personal Data Protection Code” (in the following, the “Code”) please find below information on the use by our company of the personal data acquired in the course of current or future contractual relations with yourselves.

The data held by ourselves, acquired in connection with contractual relations are collected and processed in compliance with applicable legislation and at all events with due confidentiality.

#### Aims of data processing

The collection or processing of personal data is exclusively intended to enable appropriate performance of the economic activity of our company, in particular as regards: the steps preceding stipulation of a contract; fulfilment of contractual obligations towards the data subject by means of execution of one or several actions or a set of operations required for fulfilment of said obligations; executing the tasks attendant to or required by the contract; performing statistical analysis and meeting statutory requirements. Data will be filed for maximum ten years.

#### Data handling methods

With regards to the above mentioned aims, personal data is processed by means of manual, IT and telematic tools, with logics closely linked to said aims, and at all events, so as to ensure the safety and confidentiality of data pursuant to the above mentioned law.

#### Nature of data provision

In order to enable the entering into and execution of the contractual relationship, the collection of personal data is also of a compulsory nature for the purpose of fulfilling legal and tax requirements. Refusal to supply said data will make it impossible to establish relations with the company. Associated handling does not require the consent of the data subject.

#### Communication and dissemination

Personal data and their processing will be communicated to companies performing economic activity (commercial, management, IT systems managers, insurance companies, banking or non banking brokers, travel agencies, tour operators, factoring companies, shippers and mailing companies) or for the

performance of statutory obligations (accountant practices, lawyers). Said data will not be disseminated.

Your data might be accessed by the data controllers and the internal persons in charge of processing.

### Rights of the data subject

Data subjects may contact the Privacy Service of the data controller to check their data and request integration, updating or rectification of the same and/or to exercise other rights as established by Article 7 of the Code (attached hereunder).

### Data controller

The data controller is DELPHINA SRL, LOC. CALA DI LEPRE, 07020 PALAU (SS). The data processor to which data subjects can apply to check their data is Dr. Pietro Porqueddu, c/o Delphina S.r.l.

Article 7 of Legislative Decree 196/03 (Right to access to personal data and other rights)

1. A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her exist, regardless of their being already recorded, and communication of such data in intelligible form.

A data subject shall have the right to be informed:

- a) of the source of the personal data;
- b) of the purposes and methods of processing;
- c) of the logic applied to processing, if the latter is carried out with the help of electronic means;
- d) of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);
- e) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.

3. A data subject shall have the right to obtain

- a) updating, rectification or, where interested therein, integration of the data;
- b) erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
- c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

4. A data subject shall have the right to object, in whole or in part,

- a) on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
- b) to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.