

Cisalpina Tours UK Limited Privacy Policy

Our contact details

Name: Cisalpina Tours UK Limited

Address: 5 Roundwood Avenue, Stockley Park, Uxbridge, United Kingdom, UB11 1AF

Phone Number:

E-mail: booking.uk@cisalpinatours.com

In accordance with applicable data protection laws, including the UK Data Protection Act 2018, as amended, which establishes the protection of data subjects, Cisalpina Tours UK Limited shall process your personal data lawfully, fairly and in a transparent manner ensuring the protection of your confidentiality and rights.

Cisalpina Tours UK Limited is fully committed to ensuring your privacy is respected at all times. Personal data and information submitted by you, or otherwise acquired whilst using Cisalpina's website, shall be processed in compliance with this policy and in accordance with applicable data protection laws.

The type of personal information we collect

We currently collect and process the following information:

- personal identifiers, contacts and characteristics (for example, name, contact details, address, age, date of birth, gender, nationality, passport number, ID number, visa information) provided directly by you, through the website, phone, letter, e-mail, SMS or messaging systems.
- health, disabilities data, for example for specific travel arrangements or in-flight meals, which we will process on the basis of your informed and specific consent.
- navigation data, i.e. IP addresses or domain names of computers and other devices used by you in connecting to the website, URI (Uniform Resource Identifier) addresses of requested resources and any time indications thereof, parameters relating to your operating system and IT environment, start and finish pages, navigation index and identification behaviour during display of website pages.
- personal information provided voluntarily by you, the optional, explicit, voluntary sending of e-mails to the addresses provided on the website and the compilation of forms it contains, implying the subsequent acquisition of your personal information (for example, name, surname, and e-mail address); and

Please note the website is not intended to be used by minors and no data from minors shall be collected by Cisalpina Tours UK Limited. In the event that Cisalpina Tours UK Limited becomes aware of the collection of such data (e.g. via the contact form) it will delete the data

immediately unless a person exercising parental responsibility for the minor provides us with written consent to the collection of the minor's personal data.

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- to enable us to make enquiries for, plan and book travel arrangements for you within the United Kingdom or overseas.
- to provide you with information, newsletters or advertising, marketing or sales communications regarding your requests, our services or services provided by our subsidiaries, affiliates, and group companies, or third parties in accordance with your preferences, for example by phone, letter, e-mail, SMS, messaging systems. You may opt-out or unsubscribe from newsletters or advertising, marketing, or sales communications at any time by letting us know on our website or contacting us at rpdcis@cisalpinatours.it. Please note that phone calls may be recorded for quality assurance, training, and monitoring purposes in accordance with applicable laws and data protection legislation. You will be notified at the beginning of a call if a call is being recorded.
- to handle requests, comments or complaints made by you. You have the option of making anonymous comments or complaints. However, please be aware that in such cases it will be impossible for us to follow up on your comment or complaint to provide assistance and support. Please note we may use the contents of requests, comments, or complaints to improve our services. We limit, so far as possible, the use of data that may identify you personally in accordance with applicable data protection laws.
- to perform operations related to the management of users and visitors to the website. Please note any refusal to allow processing for this reason may limit and/or prevent the full use of functionalities and services available on the website;
- for statistical analysis, in anonymous and/or aggregate form, to verify the quality of services provided by the website. Consent to allow processing for this reason is optional and shall not affect the functionality and services on the website.
- to share with social network managers the interaction achieved and the usage data relating to the web pages where cookies are installed which integrate software functions or products. Consent to allow processing for this reason is optional and shall not affect the functionality and services on the website.

Please note when accessing our website, consent is provided by clicking on the brief cookie policy and the option to "ALLOW ALL COOKIES" on the website. With regard to the optional provision of data, further information on the cookies present on the website in the cookie policy document can be accessed from the brief cookie policy on the website. You can change your consent at any time by accessing the "Review your cookie choices" area at the footer of the website.

We use the information that you have given us in order to make enquiries for, plan and book travel arrangements for you to travel within the United Kingdom or overseas].

We may share this information with the following organisations or individuals for the purposes of making enquiries for, planning and booking travel arrangements for you:

- Cisalpina Tours S.p.A., its affiliates, subsidiaries or group companies.
- commercial partners including travel providers, tour operators, tour guides, travel agents, service providers, airlines, railway operators, taxi firms, bus operators and other transportation operators, travel insurers, hotel companies and food and beverage providers located in the United Kingdom, European Union and non EU/EEA countries;

All data sharing and transfers are carried out with appropriate safeguards to ensure that transfers are in compliance with applicable data protection laws.

For data processed by cookies only, your data will be transferred to countries outside the United Kingdom and the European Union as indicated in the cookie policy of the companies providing the third-party cookie services. For more information, contact rpdcis@cisalpinatours.it

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent:

You are able to remove your consent at any time. You can do this by contacting rpdcis@cisalpinatours.it

(b) We have a contractual obligation:

The processing is necessary for a contract we have with you or because we have asked you to take specific steps before entering into a contract with us.

(c) We have a legal obligation:

If we have a legal obligation or the processing is necessary for us to comply with the law (not including contractual obligations).

(d) We have a legitimate interest:

The processing is necessary for our legitimate interests or the legitimate interests of a third party.

Your personal information may also be disclosed to companies providing:

- in-cloud services; and
- IT service management services, including server hosting and backup services,

for which data disclosure is compulsory for the fulfilment of legal requirements or for functional or administrative purposes.

How we store your personal information

Your information is securely stored on files and servers in the United Kingdom and in countries belonging to the European Union.

We keep your personal information for as long as is necessary for the purposes for which the personal information is collected and processed in accordance with our retention policy and in any event no longer than as specified by applicable data protection laws. We may, with your agreement, keep your personal information for record keeping, statistical analysis, reference, advertising, marketing or sales purposes or other legitimate purposes in accordance with applicable data protection laws.] To obtain more information about our retention policy please contact us at rpdcis@cisalpinatours.it. We will then dispose your information by deleting your personal information from our records and systems. accordance with applicable data protection laws.

Please note that navigation data is stored for the time frames specified in the cookie policy, which is available on the website.

Your data protection rights

Under data protection law, you have rights including:

Your right of access

You have the right to ask us for copies of your personal information, including, in certain circumstances, the right to receive information regarding the source of your personal information, details of the purposes, processing methods and processors, the logic applied in processing, in the event processing is carried out by electronic instruments, and confirmation of the existence of your personal information, even if such personal information has yet to be recorded, in accordance with applicable data protection laws. You also have the right to request the personal information of minors or vulnerable persons where you have provided such data or information as a person of parental or legal responsibility.

Cisalпина Tours UK Limited reserves the right to ask for proof of identity, as well as to refuse provision of the data or information if the identity or relevant connection to the data subject cannot be proven.

Your right to rectification

You have the right to ask us to rectify, update, or integrate personal information you think is inaccurate. In accordance with applicable data protection laws, you also have the right to ask us to complete information you think is incomplete and the right to ask for confirmation that all such requests have been made to entities to which your personal information has been disclosed, transferred, or provided, unless this proves impossible or requires the use of means disproportionate to the rights being protected.

Your right to erasure

You have the right to ask us to erase or anonymise your personal information in certain circumstances, including if it was unlawfully processed or if retention is not required in relation to the purposes for which the personal information was collected or processed. In accordance with applicable data protection laws, you also have the right to ask for confirmation that all

such requests have been made to entities to which your personal information has been disclosed, transferred, or provided, unless this proves impossible or requires the use of means disproportionate to the rights being protected. Please note that personal information may in certain circumstances be required to be retained by Cisalpina Tours UK Limited in accordance with applicable data protection laws.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your personal information in certain circumstances, for example:

- where you are contesting the accuracy of the personal information, we will restrict processing to enable us to verify the accuracy of your personal information, and we will notify you regarding the lifting of the restriction.
- the processing is unlawful, and you oppose the erasure of the personal information and request the restriction of its use.
- if Cisalpina Tours UK Limited does not need to process the personal information but it is required by you for the purposes of commencing or defending legal claims; and
- where you have objected to the processing of your personal information, subject to whether our legitimate interests to process your personal information outweighs your rights as a data subject, subject to applicable data protection laws.

Your right to object to processing

You have the the right to object to the processing of your personal information in certain circumstances, including for legitimate reasons, and to withdraw your consent to the collection of your personal information.

Your right to data portability

You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances, for example where processing of your personal information was based on your consent or your contractual relationship with Cisalpina Tours UK Limited.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at rpdcis@cisalpinatours.it if you wish to make a request.

Website and cookies

The website shall display information dedicated to services, available on request, requiring the submission of your data and information in data collection forms. To provide a complete service, the website may contain links to other websites, not managed by Cisalpina Tours S.p.A. Your personal information may be acquired by means of tools and services provided by third parties and stored by the same. Cisalpina Tours UK Limited is not responsible for errors, contents, cookies, publication of illegal moral content, advertising, banners, or files that

do not comply with applicable laws in force or respect privacy laws by sites not managed by Cisalpina Tours UK Limited.

Your personal information will be processed manually, electronically and/or telematically, using cookies (as indicated in the cookie policy available on the website), and through automated contact methods (for example, automated campaigns involving sending e-mails, phone calls, social media etc.), in compliance with applicable data protection laws and through the adoption of the appropriate security measures.

To compare and improve communications, we use systems for the sending of newsletters and promotional notifications with reports. By means of the said reports, we can find out, for example: the number of readers, openings, one-time “clickers” and clicks, devices and operating systems used to read the communications, details on the activity of individual users; details of e-mails sent according to the date/time/minute, details of e-mails delivered and otherwise, of forwarded e-mails, a list of those who unsubscribed from the newsletter, those who opened an e-mail or clicked on a single link, users who experienced problems in viewing the message, link tracking (i.e. the number of clicks on the links in the message), click tracking (which links were clicked and by whom). All these data are used for the purpose of comparing, and possibly improving, the results of communications.

Please note that Cisalpina Tours UK Limited is merely an intermediary for the links indicated in the cookie policy and cannot be held in any way responsible in the event of any modifications.

Newsletter

By filling in the form available in the “**Newsletter**” section of the website, your personal information (for example, name, surname, e-mail address) will be used to accommodate your request for a customised newsletter to be sent to you and the related subscription to the mailing list for the purpose of direct marketing activities, newsletters and the sending of promotional and commercial information relating to the activities and products of Cisalpina Tours UK Limited, by e-mail, a software system managed by third parties and also through the insertion of the same in the company CRM system, in full compliance with applicable laws and data protection legislation. Provision of your personal information is optional, however, your refusal to provide the same will prevent your request being accepted to subscribe to the newsletter and for you to be informed of news from Cisalpina Tours UK Limited. Your data will be stored until you decide to unsubscribe from the service.

Information request

By filling out the forms accessible in the “**contact us**” section, your personal information (name, surname, e-mail address, country, etc.) will be used to respond to your information request. Your data will be stored for the time frames necessary to provide the service you have requested.

Recruitment

By filling out the forms accessible in the “**work with us**” section, your personal information shall be used for the management of a possible employment relationship. The provision of data for these purposes is optional, but your refusal to provide such data will prevent your CV being accepted. Please note unless it is strictly necessary, please do not communicate any special category data (e.g. health status, racial and/or ethnic origin, trade union membership, religious or philosophical beliefs). If communicated, subject to applicable data protection laws,

we shall determine which data should be kept and which to be deleted. Your data will be kept for the time required to provide the service you have requested. Your data will be kept for a period not exceeding 2 years.

Social Media

Cisalпина Tours UK Limited may provide links to social media platforms which lead to servers installed by individuals or organisations over which it has no control. Cisalpina Tours UK Limited provides no representation, nor does it take any responsibility for the accuracy or any other aspect of the information available on such sites. Links to third-party websites cannot be treated as validation of such websites, on behalf of Cisalpina Tours UK Limited, nor on behalf of the said third parties, of the products and services of others or of the third parties. Cisalpina Tours UK Limited does not issue declarations or guarantees as to the use or filing of your data with third-party websites. We suggest that all users examine the privacy policies that govern the third-party websites linked to our website carefully to understand the use of personal information on such websites.

Amendments to this policy

Cisalпина Tours UK Limited reserves the right to update, modify, add, or remove aspects of this policy to adapt it to any changes in the law and with due consideration of any suggestions submitted by employees, customers, associates, and users in accordance with applicable data protection laws. If amendments are made by Cisalpina Tours UK Limited, the privacy policy on the website will promptly be updated.

Requests for information

If you wish to make a request for information or a subject access request, you can write to us at rpdcis@cisalpinatours.it. Cisalpina Tours UK Limited will respond to requests for information and subject access requests in accordance with applicable data protection laws.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at rpdcis@cisalpinatours.it.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>