



## Privacy Policy

“Guidi Tour srl” with registered office in Rome, Via Costantino 4 – 00145 email [info@guiditour.com](mailto:info@guiditour.com) P. I. 12781001008 and C. F. 12781001008 (hereinafter, the “Holder”), in quality of holder of the treatment, informs You, pursuant to art. 13 Regulation (EU) no. 2016/679 (hereinafter “GDPR”) that Your data will be processed in the manner and for the purposes following:

### 1. The object of the treatment.

The data controller processes the personal data, identification data and non-sensitive (in particular, name, surname, tax code, address of residence, place and date of birth, email, telephone number – hereinafter referred to as “personal data” or “data”) by You communicated in phase of recording to the web site of the Holder and/or at the time of registration to the newsletter service offered by the Owner or booking a tourist service or signing up for an event.

### 2. Holder of the Treatment.

Pursuant to art. 13 of d.lgs. 196/2003, Code regarding the protection of personal data, “Guidi Tour srl” (hereinafter also the “Company”), with registered office in Rome, Via Costantino, 4 – 00145 email [info@guiditour.com](mailto:info@guiditour.com) is the Owner, ex art. 28 d.lgs. 196/03, of the processing of your personal data. The Company informs you that the personal data collected, processed in accordance with the above regulations. The updated list of data processors and persons in charge the treatment is kept at the registered office of the Holder of the treatment.

### 3. The purposes of the processing

A - personal data will be used exclusively to manage the relationship with the customer/user and all communications necessary for the use of the form of subscription activated. The purpose of the processing of personal data are the following: - the fulfilment of all the obligations related to the trade relationship aimed at the realization of cultural activities, events and travel packages. The personal data will be used exclusively to manage the relationship with the customer/user and all communications necessary for the use of the form of subscription activated. - the fulfilment of all the obligations of law related to the commercial relations, related to the implementation of cultural activities, events and travel packages. - to carry out in his name: reservations of hotel services; and Reservation ticket airline, train, ship and any other mode of transport closely connected with the carrying out of the services booked/purchased; Reservations sites, museums, archaeological sites and art and in all those sites where there is face required; insurance; personal closely linked to the activities of tourist Guidi Tour guides, tour guides, etc.); -promotion of tourist products (via mail); - send letters of welcome, inform of new products, take surveys, and preferences of the target; - to meet the obligations of pre-contractual, contractual and tax arising from the relationships with You; - to fulfil the obligations laid down by law, regulation, by legislation or by an order of the Authority; - grant the use of the services You requested, to process a request for contact, or to prevent or uncover fraudulent activities or misuse that is damaging to the Site, - the exercise of the rights of the Holder, for example the right to legal defence, The customer/user allows the access of personal data by Third Parties, such as the current Partners to “Drive Tour srl”, as well as any future Partners.

B - allow the registration to the newsletter service provided by the Holder and the additional Services of commercial communication and promotion, possibly You have requested.

### 4. Place of data processing

“Guidi Tour srl” (hereinafter also the “Company”), with registered office in Rome, Via Costantino 4 – 00145

### 5. Data collected

The personal data are collected as supplied directly by the data subject or provided automatically. The data provided directly by the interested party, are all the personal data that are provided to the Holder of the Treatment, by any means, directly by the individual. In particular, they are collected and processed the following personal data:

- list data collected: name , surname, tax code, address of residence, place and date of birth, email, phone number, The data collected automatically are data navigation. These data, although not collected to be associated with the identity of the user, may indirectly, through processing and association with data collected by the Owner, and to allow its identification. In particular:



- list the data collected [IP address, browser, etc.] Following the sending of the newsletter, the platform allows you to detect the opening of a message, and clicks made on the inside of the newsletter, together with details of the ip and the browser/device used . The collection of these data is fundamental to the functioning of the systems of renewal implicit in the treatment (see Mode of Treatment), and an integral part of the operations of the platform to send.

## **6. Methods of treatment**

The processing of Your personal data is carried out by means of operations indicated in art. 4 the Privacy Code and art. 4 no. 2) GDPR, and namely: collection, registration, organization, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Your personal data are subjected to processing both paper and electronic and/or automated. The Holder will treat personal data for the time necessary to fulfill the purposes of the above, and in any case not later than 10 years from the termination of the employment relationship for the Purposes of the Service. The data for Marketing purposes will be treated for not more than 3 years from their collection.

## **7. Access to the data**

Your data may be made accessible for the purposes referred to in art. 2:

- to employees and collaborators of the Holder or of the company Guidi Tour srl is a member, in their capacity as officers and/or managers to internal processing and/or system administrators.

## **8. Communication of the data**

The data communicated by you could possibly be forwarded, without Your consent, to organs of control, the police or the judiciary, which will handle, on request, in their capacity as independent data controllers for purposes and/or in the force of law in the course of investigations and audits. Your Data may also be disclosed to third parties in the capacity of autonomous data controllers, to perform activities instrumental to the purposes indicated.

## **9. Data transfer**

The management and conservation of personal data will be on servers located within the European Union, of the Owner and/or third-party companies contracted and duly appointed as Responsible of the treatment. Currently servers are located in Italy. The data will not be transferred outside of the European Union. In any case it remains understood that the Owner, if necessary, shall have the right to move the location of the servers in the Italy and/or European Union and/or non-EU Countries. In this case, the data controller ensures that from now on that the transfer of data outside the EU will be in accordance to the applicable legal provisions stipulating, if necessary, agreements that ensure an adequate level of protection and/or adopting the standard contractual clauses provided by the European Commission.

## **10. Nature of data conferment and consequences of refusal**

The conferment of personal data for the purposes referred to in art. 3 is mandatory. In their absence, will not guarantee, nor the registration on the website or the Services of the art. 3.

The conferment of personal data for the purposes referred to in art. 2.B) is optional. You can then decide not to give any data or deny then the possibility of treatment of data already provided: in this case, you will not receive newsletters, commercial communications and advertising material concerning the Services offered by the site Owner. In any case, you will continue to be entitled to the Services referred to in art. 2.A).

## **11. Rights of the interested party**

In quality of interested, she has the rights referred to in art. 7 of the Privacy Code and art. 15 GDPR, namely the rights of:

1. obtain confirmation of the existence or not of personal data concerning You, even if not yet recorded, and their communication in intelligible form;
2. obtain the indication: a) origin of personal data; b) the purposes and methods of processing; c) the logic applied in case of treatment effected with the aid of electronic instruments; d) the identification details of the holder, data processors and the representative designated pursuant to art. 5, paragraph 2, of the Privacy Code and art. 3, paragraph 1, of the GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or that can come to acquaintance in quality of representative designated in the territory of the State, managers or agents;



3. obtain: a) updating, rectification or, when interested, integration of data; b) cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose conservation is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) certification that the operations referred to in letters a) and b) have been notified, also as regards their content, of those to whom the data were communicated or disseminated, excepted the case in which such fulfillment proves impossible or involves a use of means manifestly disproportionate to the protected right;

4. oppose, in whole or in part: a) for legitimate reasons the processing of personal data concerning You, even if pertinent to the purpose of collection; b) to the processing of personal data concerning You for purposes of sending advertising materials or direct selling or for carrying market research or commercial communication, through the use of automated calling systems without the intervention of an operator, by email and/or through traditional marketing, by phone and/or mail. It is noted that the right of opposition of the interested party, exposed in the previous point b), for the purposes of direct marketing by means of automated systems extends to the traditional ones and still save the possibility for the interested party to exercise the right of opposition, even only in part. Therefore, the user can elect to receive communications only through traditional methods or communication only, automated, or none of the two types of communication.

Where applicable, you also have the rights referred to in art. 16-21 GDPR ("Right of rectification, right to be forgotten, the right to restriction of processing, the right to data portability, right to object), as well as the right of complaint to the Authority. .If the user does not want to receive e-mail marketing, you may adjust your "personal information preferences" as described below or follow the instructions for unsubscribing included in each e-mail received.

## **12. Revocation of Consent**

The interested party may revoke his consent to the processing of the data you linked, or to the receipt of promotional communications, and business immediately, by sending a request to the email address [info@guiditour.com](mailto:info@guiditour.com) or by clicking on the link unsubscribe that you will find on the footer of every promotional email and business received from Guidi Tour.

## **13. Minor**

Our services present in our programming and on our website [www.guiditour.com](http://www.guiditour.com) they are not intended for children under the age of 18 years and the Owner does not intentionally collect personal information related to minors. In the case in which information about the minors were inadvertently registered, the Owner will cancel in a timely manner, at the request of users.

## **14. Navigation data**

The computer systems and software procedures for the operation of the web site of the Owner of the Treatment, [www.guiditour.com](http://www.guiditour.com) , acquire some personal data whose transmission is implicit in the communication protocols of the Internet - which are not collected to be matched to identified interested parties but which could, through processing and associations with data held by third parties, allow in some cases to identify the users. In this category of data includes IP addresses or domain names of computers used by users who connect to the site, addresses in URI notation (Uniform Resource Identifier) of requested resources, time of request, the method used in submitting the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server (successful, error, etc..) and other parameters regarding the operating system and the computer environment of the user. These data are used only to obtain anonymous statistical information on site usage and to check its correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site: save this eventuality, data on web contacts do not persist for more than seven days.

## **15. Cookies**

From the website of the Holder of the Treatment, [www.guiditour.com](http://www.guiditour.com) you can either accept or reject the cookies (with particular reference to those of nature are not strictly technical).

Most web browsers automatically accept cookies, but you can change this setting to decline cookies under the conditions indicated, depending on the case.

Cookies are devices that are of a technical nature necessary to facilitate the navigation in the network for the sole purpose of being able to realize the transmission of a communication over an electronic communications network, or



to the extent strictly necessary for the provider of an information society service explicitly requested by the user, which can be applied also for other purposes, as hereinafter better explained.

In addition to the cookies (on our websites and in promotional e-mail messages or in our newsletters), we may use other technologies with similar functions, including GIF images consisting of only one pixel (also known as Web Beacons) that allow us to determine the number of users who have visited certain pages or opened messages or newsletters.

#### **16. Link**

The internet site of the Holder of the Treatment, [www.guiditour.com](http://www.guiditour.com) it contains links to other websites, including the sites of content providers, which policies and practices of privacy different from those described in this document. The company does not assume any responsibility for the policies or practices of linked sites, and encourage you to review them before using such sites.

#### **16. Updates and Amendments to this Privacy policy**

“Guidi Tour srl” reserves the right to change, amend or update periodically this Information in accordance with the applicable regulations, or to measures adopted by the Garante for the Protection of personal data. These changes or additions will be brought to the attention of the interested parties with a link to the page of Privacy Policy on this web site and will be communicated directly to interested parties by email. We encourage you to review the Privacy Policy regularly to check the updated Statement and decide whether or not to continue to take advantage of the services offered.

#### **17. Mode of exercise of the rights**

You can at any time exercise your rights: by sending a letter to.r.to the Holder at the address of Via Costantino 4 - 00145 Rome, Italy or by sending an e-mail to the address [info@guiditour.com](mailto:info@guiditour.com). For any information we are available at the number phone 39.335 6585053.

#### **INFORMATION RESERVATIONS**

Pursuant to article 13 of the Code and of the Regulation (Eu) 679/2016, we wish to inform you that your personal data will be collected and processed by Guidi Tour srl, in quality of holder, for the following purposes: 1) performance of the reservation made in His name and the fulfilment of tax obligations, administrative and accounting. The communication of its personal data to fulfill the purposes listed above is compulsory and any refusal to supply them because of the impossibility to lead Tours ltd to give rise to the relationships in the object. Its treatment requires the consent of the person Concerned. The owner informs to have adopted all the precautions prescribed by current legislation in the field of data protection. The Processing the data subject does not object data of a sensitive nature. The communicated data will be kept only for the time necessary to fulfill the purposes and for the time required by law.

Guidi Tour srl handles your data correctly and in compliance with regulations to ensure safety and confidentiality. The treatment is carried out with the use of manual, computer and telematic means, with organizational methods and logics exclusively related to the accomplishment of the purposes indicated.

Pursuant to article 7 of the Code and 15 of the Regulation (EU) 679/2016 she has the right to know the confirmation and the nature of the existence of his personal data, ask the origin, purpose and the various methods of treatment, correction and updating of data, the integration of the data. Pursuant to the articles referred to above may at any time request the deletion of your data in our possession that, in its opinion, are in violation of the law and has the right to oppose the processing for purposes of sending information and promotional material. To do so may send a communication to guide Tours srl, registered office in Via Costantino, 4 00145 Rome, Italy, email [info@guiditour.com](mailto:info@guiditour.com).

#### **INFORMATION OFFERS, PROMOTIONS AND NEWSLETTERS**

We wish to inform you pursuant to article 13 of the D. lgs. 196/03) and of the Regulation that your data will be processed by Guidi Tour srl, in quality of Holder of the Treatment, for the purposes of (a) replying to your request and send you our newsletter if consent is given, (b) to send you promotional materials, offers and information. The data provided by you will not be in any way disclosed to third parties and will be processed for the time necessary to achieve the purposes indicated. To exercise your rights under article 7 of D. lgs. 196/03 and 15 of the Rules, you can write an email addressed to the Owner at the address [info@guiditour.com](mailto:info@guiditour.com)

#### **INFORMATION FOR SUPPLIERS**



Guidi Tour srl informs that, pursuant to article 13 of D. lgs. 196/03) and of the Regulation, the personal data will be processed by Guidi Tour srl, in quality of Holder of the Treatment, for the purposes of (a) replying to its request and should provide us with the consent, b) to send you promotional and/or informative. Your data will not be disseminated and/or communicated to third parties and will be handled for the time necessary to achieve the purposes referred to above. To exercise the rights referred to in article 7 of the D. lgs. 196/03 and 15 of the Regulation may contact the data controller by writing to [info@guiditour.com](mailto:info@guiditour.com)

#### **NORMATIVE REFERENCES**

Regulation (Eu) 2016/679

Directive 2002/58/EC – concerning the processing of personal data and the protection of privacy in the electronic communications sector”

The Legislative decree of 30 June 2003, n. 196 – “Code regarding the protection of personal data”

#### **Information on Cookies**

In compliance with the Directive 2009/136/EC, we inform you that our website uses cookies.

Information on the use of cookies

The website uses technical cookies, and third-party cookies to ensure the proper functioning of the procedures and improving the experience of use of online applications. This document provides information on the use of cookies and similar technologies, how they are used by the site and how to manage them.

#### **Definitions**

Cookies are short bits of text (letters and/or numbers) which allow the web server to store on the client (browser) information to use in the course of the same visit to the site (session cookies) or below, even at a distance of days (persistent cookies). The cookies are stored, according to the preferences of the user from a single browser on the specific device used (computer, tablet, smartphone).

Similar technologies, such as, for example, web beacons, clear GIFS, and all forms of local storage introduced with HTML5, that can be used to collect information on user behavior and on the use of the services.

In this document, we will refer to cookies and all similar technologies by simply using the term “cookie”.

#### **Types of cookies**

According to the characteristics and to the use of cookies, we can distinguish different categories:

- **Technical cookies** . Technical cookies are those used only for the purpose of "carrying out the transmission of a communication over an electronic communications network, or to the extent strictly necessary for the provider of an information society service explicitly requested by the subscriber or user to provide the service" (cf. art. 122, paragraph 1, of the Code).

They are not used for further purposes and are normally installed directly by the owner or operator of the web site.

Can be divided into cookie or navigation session, which guarantee the normal navigation and use of the website; analytics cookies, similar to technical cookies where used directly by the site operator to collect information, in aggregate form, on the number of users and on how they visit the site; functionality cookies, which allow the user the navigation function of a set of selected criteria in order to improve the service rendered to the same.

For the installation of these cookies is not required the prior consent of the users, while there still remains the obligation to give the notice pursuant to art. 13 of the Code, the operator of the site, if you use only those devices, will be able to provide you with the modalities that it considers most appropriate.

- **Cookie profiling** . The cookie profiling are aimed at creating profiles related to the user and are used to send advertising messages in line with the preferences expressed by the same in the context of the navigation in the network. Because of the particular invasiveness of such devices can have in the private sphere of the users, the european legislation and the Italian expects that the user should be adequately informed about the use of the same, and to express their valid consent.

To them refers the art. 122 of the Code where it provides that "the storage of information in the terminal equipment of a subscriber or user or access to information already stored, is only permitted on the condition that the contracting

**GUIDI TOUR Srl**

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party or user has given his consent after being informed with the simplified arrangements referred to in article 13, paragraph 3." (art. 122, paragraph 1, of the Code). This site does not use cookies profiling.

• **Third-party cookies.** By visiting the website you may receive cookies from the site visited ("owners"), both sites maintained by other organisations ("third parties"). A remarkable example is represented by the presence of "iframe", "plugin" or "script". They are parts of the visited page, which are generated directly by the above-mentioned sites and integrated in the page of the host site. The presence of these plugins involves the transmission of cookies to and from all web sites operated by third parties. The management of the information collected by "third parties" is governed by the related information please refer.

### **Google Analytics**

This site also includes some components transmitted by Google Analytics, a web traffic analysis service provided by Google, Inc. ("Google"). Also in this case, the third-party cookies collected and managed anonymously to monitor and improve the performance of the host site (performance cookie).

Google Analytics uses "cookies" to collect and analyze anonymous information on the behavior of the use of the website (including your IP address). Such information is collected by Google Analytics, which processes the purpose of drawing up reports regarding the activity on the web sites themselves. This website uses the analysis tool of Google to track or to collect any personal identification information. Google will not associate your IP address with any other data held by Google nor does it seek to link, an IP address with the identity of a user. Google may also communicate this information to third parties where required to do so by law or where such third parties process the information on Google's behalf.

For more information, please refer to the link below:

<https://policies.google.com/technologies/partner-sites?hl=en-GB>

The user can selectively disable the action of Google Analytics by installing the browser component of the opt-out provided by Google. To disable the action of Google Analytics, please refer to the link below:

<https://tools.google.com/dlpage/gaoptout?hl=en-GB>

### **Cookie duration**

Some cookies (session cookies remain active only until you close your browser or the execution of any command to logout. Other cookies "survive" the closing of the browser and are also available in the subsequent visits of the user. These cookies are called persistent, and their duration is set by the server at the time of their creation. In some cases, set a deadline, in other cases the duration is unlimited.

### **Cookie management**

The user can decide whether or not to accept cookies using the settings in your browser.

Warning: the disabling of all or part of the technical cookies can impair the use of the functionality of the website reserved for registered users. On the contrary, the usability of the public content, it is also possible to completely disabling cookies.

The disabling of cookies "third party" is not in any way affect the airworthiness.

The setting can be defined in a specific way for different web applications and web sites. Also, the best browser allow you to define different settings for cookies "owners" and those of "third parties".

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer>

Internet Explorer: <https://support.microsoft.com/en-gb/hub/4338813/windows-help?os=windows-7>

Safari: <https://support.apple.com/en-euro/HT201265>

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