

Privacy and cookies policy

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Your privacy is very important to VI.FA. TOUR S.r.l.. We've therefore developed a privacy policy about the way we collect, use, divulge, transfer and save your data. Please read this document to be informed about our parameters for the privacy protection and kindly let us know whether you have any kind of question.

In this document, we describe the way **VI.FA. TOUR S.r.l. as data controller**, collects, uses, shares and keeps your personal data in accordance to the **EU Regulation no. 2016/679 of the European Parliament and Council of April, 27th 2016** (the General Data Protection Regulation or RGPD or GDPR). This Privacy policy describes which are all collected and generated (processed) personal data when you use the web sites of VI.FA. TOUR S.r.l. (www.vifatour.it, www.vifatour.net and www.vifatour.com). It also explains how personal data are collected, used, shared and protected and which are the choices you have at disposal about personal data and how to contact us.

COLLECTION AND USE OF PERSONAL DATA

Personal information are data that can be used in order to identify or contact a specific person. You may be asked to give your personal data each time you get in contact with VI.FA. TOUR S.r.l.. VI.FA. TOUR S.r.l. can share these data with third companies and use them in accordance to this Privacy policy. It can furthermore combine them with other data to give and improve promotional products, services, contents and materials. You don't have to give the personal data we ask for; if you decide not to give them, in many cases we couldn't however offer you our products or services or answer to your questions. Here are a few types of personal data that VI.FA. TOUR may collect and their uses.

WHICH PERSONAL DATA WE COLLECT

When you contact VI.FA. TOUR S.r.l. or browse on its web sites, we can collect a few data among whom name, address, telephone number, e-mail address, contact preferences as well as a number of technical data. VI.FA. TOUR will

use this information to satisfy your requests, give you the appropriate product or service or for anti-fraud strategies.- These personal data include:

- contact information, including name, e-mail, telephone and tracking numbers, invoice address.
- information about the payment terms
- images, photos and video
- personal preferences and web browser settings preferences when used to visit our site, as well as configuration preferences concerning marketing and cookies.

HOW DO WE USE YOUR PERSONAL DATA

All personal data we collect let us keep you updated on activities and commercial or professional offers about the services offered by VI.FA. TOUR S.r.l. as well as events or manifestations. In case you don't want to be included in our list, you can ask us to cancel or modify the data we have at any time by writing us to our e-mail address privacy@vifatour.it.

We use your personal data in these ways:

A. IN ORDER TO GUARANTEE THE BEST WEB SITES FUNCTIONALITY AND OF THE SERVICES WE ARE REQUIRED

1. When our web sites are used, we will use the personal data to provide the requested product or services. For example, we will use the information you give us to communicate with you about the service, use conditions or promotion (if any). In order to provide even better services, we will use certain information about you, such as information for delivery or payment terms or information about the product/service that you have purchased to help you solving a problem or give an answer to a question.
2. In many cases, to use particular functions in our websites it may be necessary to provide VI.FA. TOUR S.r.l. with additional data or additional consent for the use of certain data in a certain way. For example, if there is an calendar event or a file exchange service on the site. Likewise, to share content on social media, you may be required to provide the relevant account credentials to log in.

B. TO COMMUNICATE INFORMATION ABOUT OUR PRODUCTS, SERVICES, EVENTS AND FOR OTHER PROMOTIONAL PURPOSES

1. After obtaining your consent, we will send you communications and news concerning our new products, services, events or other promotions. This consent may be revoked at any time.
2. If you are already a VI.FA. TOUR S.r.l. customer, we may use previously provided contact details to send communications for promotional purposes on products or services where this is permitted by applicable legislation (unless you have chosen not to receive such communications). In other cases, consent will be required to send information. We may also use the provided information and the information about other products or services to personalize communications on products and services that may be of interest to you.

C. TO PERFORM, IMPROVE AND MAINTAIN OUR ACTIVITIES, PRODUCTS AND SERVICES

1. We will use the provided data to manage our business. For example, we will use this information for

accounting, auditing and other internal functions. We may use personal data on how to use our services and to improve your experience with VI.FA. TOUR S.r.l. and as a help to diagnose technical and service problems and to manage our websites and the used software in a better way.

D. TO GUARANTEE OUR RIGHTS, PROPERTY OR SAFETY

1. We may also use personal data in connection with the use of our websites, the software used to prevent or detect fraud, abuse, illegal use and violations of regulations and to comply with court orders, government requests or compliance with applicable laws.

E. FOR GENERAL SCOPE OF RESEARCH AND ANALYSIS

1. We use data on how visitors use our websites and services to understand customer behavior or preferences. For example, we can use information on how visitors of vifatour.it search and find information, to understand what may be the best ways to organize and present such information or commercial offers.

F. OTHER PURPOSES

1. We may also use personal data in other ways and at the time of collection we will give specific notice and we will request the consent if necessary.

G. LEGAL REASONS

1. We process personal data in accordance with the law according to the type of interaction with our websites.
2. Personal data is necessary to enable us to fulfill the contract we have entered into with you. For example, payment and contact details are required to proceed with the provision of services.
3. When using software applications (such as management programs) or communication technologies, we use the consent for the processing and for purposes limited to the purpose of fulfilling the contract that we have entered into with you.
4. For legal reasons, such as our legitimate business interests, to fulfill legal obligations or for the protection of your personal interests.

COLLECTION AND USE OF NON-PERSONAL DATA

We also collect data that is in a form that does not permit, in itself, direct association with a specific person. We may collect, use, transfer and disclose non-personal information for any purpose. Here follow some examples of non-personal data collected by us and its use:

- We can, for example, collect data on profession, language, postal code, telephone prefix, unique device identification code, reference URL, place and time zone in which a VI.FA. TOUR S.r.l. product or service is used in order to understand better the customer behavior and improve our products, services and information materials.

- We may collect data about customer activities on our websites or from our other products and services. This data is aggregated and used to help us provide more useful information to our customers and to understand which parts of our websites and our products and services are of greatest interest. Pursuant to this Privacy Policy, this aggregated data is considered non-personal information.

- We can collect and store details about the use that users make on online services. This information can be used to improve the relevance of the results provided by our services. Except for limited cases designed to ensure the quality of these services on the internet, this information is not associated with the IP address.

After obtaining your explicit authorization, we can collect data on your use of the service, the device and the applications, to help developers improve the service and offered information.

If we combine non-personal data and personal data, the aggregated data will be treated as personal data as long as they remain aggregated.

COOKIES AND OTHER TRACING TECHNOLOGIES

For websites, online services, interactive applications, e-mail messages and commercial offers of VI.FA. TOUR S.r.l., cookies and other technologies such as pixel tags and web beacons can be used. These are technologies that help us to better understand users behavior, they tell us which parts of our websites have been visited and promote and measure the effectiveness of communications and web searches. We process data collected through cookies and other technologies as non-personal data. However, where local law considers IP addresses (Internet Protocol) or similar identifiers, as personal data, we will treat them as such. Similarly, if non-personal data is aggregated with personal data, we will treat the aggregated data as personal data for the purposes of this Privacy Policy. If you do not wish to receive communications or offers targeted to your interests from the digital platform of VI.FA. TOUR S.r.l., you can choose to enable the option "limit collection of advertising data" (or other name present in the configuration options of your browser) denying consent receipt of these offers. If you enable the "limit collection of advertising data" on your browser or mobile device, third-parties apps will not be able to use the Advertising Identifier, (a non-personal identification code of the device), to send you communications or targeted advertising. VI.FA. TOUR S.r.l. and its partners and service providers use cookies and other technologies to remember personal data when you use our websites, online services and applications. Our goal, in these cases, is to make your experience with VI.FA. TOUR S.r.l. easier and more personal. Contact details, hardware identification codes and information on your computer or device allow us to record your preferences, customize the commercial offer, configure communication services and improve customer service.

In addition to what is indicated in this document, you can manage your cookie preferences directly inside your browser and prevent - for example - that third parties can install. Through the browser preferences it is also possible to delete the cookies installed in the past, including the cookie in which the consent to the installation of cookies by this site is eventually saved. You can find information on how to manage cookies with some of the most popular browsers such as the following addresses:

Google Chrome

(https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies)

Mozilla Firefox

(<https://support.mozilla.org/it/kbAttivare%20e%20disattivare%20i%20cookie>)

Apple Safari

(<https://support.apple.com/kb/PH21411>)

Microsoft Internet Explorer

(windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies)

With regard to cookies installed by third parties, you can also manage the settings and revoke the consent by visiting the appropriate opt-out link (if available), using the tools described in the privacy policy of the third party or by contacting it directly.

Notwithstanding the foregoing, you can learn more about cookies by accessing the information provided by EDAA (UE), Network Advertising Initiative (USA) and Digital Advertising Alliance (USA), DAAC (Canada), DDAI (Japan) or other similar services. With these services it is possible to manage the tracking preferences of most advertising tools. Therefore, VI.FA. TOUR S.r.l. recommends using these resources in addition to the information provided by this document.

Like most Internet services, we collect some data automatically and store it in log files. This data includes IP addresses (Internet Protocol), browser type and language, Internet service provider (ISP), websites and reference and output applications, operating system, date, time and clickstream data. We use this data to understand and analyze trends, manage the site, learn about user behavior on the site, improve our products and services and to collect demographic data about our user base. VI.FA. TOUR S.r.l. may use this data in its marketing services.

In some of our messages or e-mails we use clickable URLs linked to the content on other websites not managed by VI.FA. TOUR S.r.l.. When you click on these URLs, customers go through several web servers before they arrive at the landing page. These web servers keep track of click data on these URLs and process the collected data for purposes that are not traceable to those described in this Privacy Policy. If you prefer not to be drawn this way, do not click on text or graphic links in e-mail messages. The list of cookies used on the VI.FA. TOUR S.r.l. websites includes:

Domain	Name
.vifatour.it	_gat_gtag_UA_162808_1
.vifatour.it	_gid
.vifatour.it	_ga
.google.com	NID

DISCLOSURE TO THIRD PARTIES

VI.FA. TOUR S.r.l. may periodically make available personal data to strategic partners who collaborate with VI.FA. TOUR S.r.l. to supply products and services or that help VI.FA. TOUR S.r.l. in carrying out its operational functions. Personal data will be shared by VI.FA. TOUR S.r.l. only to provide or improve its products, services and information materials; they will not be shared with third parties for their commercial purposes.

SERVICE PROVIDER

VI.FA. TOUR S.r.l. shares the personal data of users with companies that provide services such as data processing, management and improvement of customer data, customer support. These companies are obliged to protect your data and could be located wherever VI.FA. TOUR S.r.l. operates.

OTHERS

It may be necessary for VI.FA. TOUR S.r.l. (by law, judicial process, litigation and/or requests by public and governmental authorities within or outside your country of residence) to disclose your personal data. We could also disclose your information if we believe that it is necessary or appropriate

for security, law enforcement or other matters of public importance. We may disclose your information even if we believe that disclosure is reasonably necessary to enforce our terms and conditions or to protect our activities or users. Furthermore, in the event of reorganization, merger or sale, we may transfer all personal data collected by us to third parties involved in such transactions.

SAFETY AND PROTECTION OF PERSONAL DATA

VI.FA. TOUR S.r.l. takes the security of your personal data very seriously. We use a variety of technical and organizational security measures, including encryption and authentication tools, to maintain the security of personal data. The online presence of VI.FA. TOUR S.r.l. uses coding technologies to protect your personal data during online transmission. For the storage of personal data by VI.FA. TOUR S.r.l. are used information systems with limited access, located at our facility and that adopt various levels of protection both physical and digital. The data is stored in a secure form, even in cases where we use third-party storage solutions. We always choose the safest third-party solutions on the market and we ask our Service Providers to safeguard your data and use it only for the specified purposes. If you or another person access the websites from another device, all the information collected can be downloaded to that device, making it accessible to the user. In this case we apply the purposes and procedures described in this Privacy Policy.

CONSERVATION OF PERSONAL DATA

We will retain your personal data for the time necessary to pursue the purposes set out in this Privacy Policy, unless we are required to keep it for longer periods as a result of laws, regulations or if necessary for the resolution of litigation or judicial investigations. Access to personal data

You can help to ensure that your preferences and contact details are accurate, complete and updated by making a request to the data controller by contacting him through the dedicated e-mail address: privacy@vifatour.it. We will guarantee you the necessary assistance so that you can carry out any operation you require such as requesting to correct the data if inaccurate, request a copy of your data in our possession (in a standard digital format) or request the cancellation if VI.FA. TOUR S.r.l. is not required to keep them as required by law or for legitimate business purposes. We may refuse to respond to requests that are futile/harassing, damaging the privacy of others, are extremely difficult to meet or where access to data is not otherwise covered by local law. Requests for access, correction or deletion can be sent through the indicated contact mailbox.

RIGHT OF ACCESS TO PERSONAL DATA AND OTHER RIGHTS

The interested party has the right to obtain confirmation of the existence or not of personal data concerning him, even if not yet registered and their communication in intelligible form.

A. The interested party has the right to obtain the indication:

1. of the origin of personal data;
2. of the purposes and methods of the processing;
3. of the applied logic in case of treatment with the aid of electronic tools;
4. of the identification details of the owner, of the managers and of the designated representative;
5. of the subjects or categories of subjects to whom the personal data can be communicated or who can

learn about them as appointed representative in the territory of the State, managers or agents.

B. The interested party has the right to obtain:

1. updating, rectification or, when interested, integration of data;
2. cancellation, transformation into anonymous form or blocking of data processed unlawfully, including those whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
3. the attestation that the operations referred to in the previous points have been brought to the attention, also with regard to their content, of those to whom the data have been communicated or disseminated, except in the case in which such fulfillment proves impossible or may lead to a use of resources manifestly disproportionate to the protected right.

C. The interested party has the right to object, totally or in part:

1. for legitimate reasons to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
2. the processing of personal data concerning him for the purpose of sending advertising material or for carrying out market research or commercial communication.

Users/visitors are entitled to exercise all the rights provided for by art. 7 of Legislative Decree 196/03. At any time, furthermore, by exercising the right of withdrawal from all the services subscribed, it is possible to request the total cancellation of the data provided.

For any information, adaptation or cancellation request, please contact us at privacy@vifatour.it.

THIRD PARTY SITES AND SERVICES

The websites, products, applications and services of VI.FA. TOUR S.r.l. may contain links to websites, products and services of third parties.

Data collected by third parties, which may include geographic or contact information, are governed by their respective privacy practices. We encourage you to review the privacy practices of these third parties.

Some data may also be provided to developers so that they can understand and improve the performance of online software and services.

INTERNATIONAL USERS

All data provided may be transferred to or consulted by entities around the world according to the terms described in this Privacy Policy. Personal information related to VI.FA. TOUR S.r.l. services relating to residents outside the Italian State are controlled and processed by VI.FA. TOUR S.r.l. as data controller.

Information collected outside the member states of the European Economic Area is governed by the locally applicable Terms of Service.

OUR COMMITMENT AT COMPANY LEVEL FOR YOUR PRIVACY

To make sure that your personal data are secure, we communicate our privacy and security guidelines to VI.FA. TOUR S.r.l. employees and strictly enforce the privacy security measures within the company.

QUESTIONS ON PRIVACY

If you have any questions or concerns regarding this Privacy Policy adopted by VI.FA. TOUR S.r.l. or the processing of data, or if you wish to file a claim for a possible violation of privacy protection, please contact us via the appropriate e-mail address privacy@vifatour.it.

Upon receipt of a privacy question or a request for access or modification of data, an appointed employee will review the messages received and will endeavour to solve the problem raised or to comply with the request sent. In cases where the problem is more substantial, if necessary, more information will be requested. All requests of a substantial nature receive an answer. If the answer received is not satisfactory, you can forward the complaint to the appropriate supervisory bodies in your jurisdiction. If you request it, we are committed to providing you with information on the complaints process that may apply to your situation.

VI.FA. TOUR S.r.l. may periodically update this Privacy Policy. In case of substantial changes, a notice will be posted on our websites, together with the updated Privacy Policy.

The holder of the data processing is:

VI.FA. TOUR S.r.l.

with headquarters in:

Via Enrico Bassano, 64
00123 Roma - Italy

that may use the data for all the purposes specified in this document.

This VI.FA. TOUR S.r.l. Privacy Policy has been updated on May 22nd 2018.