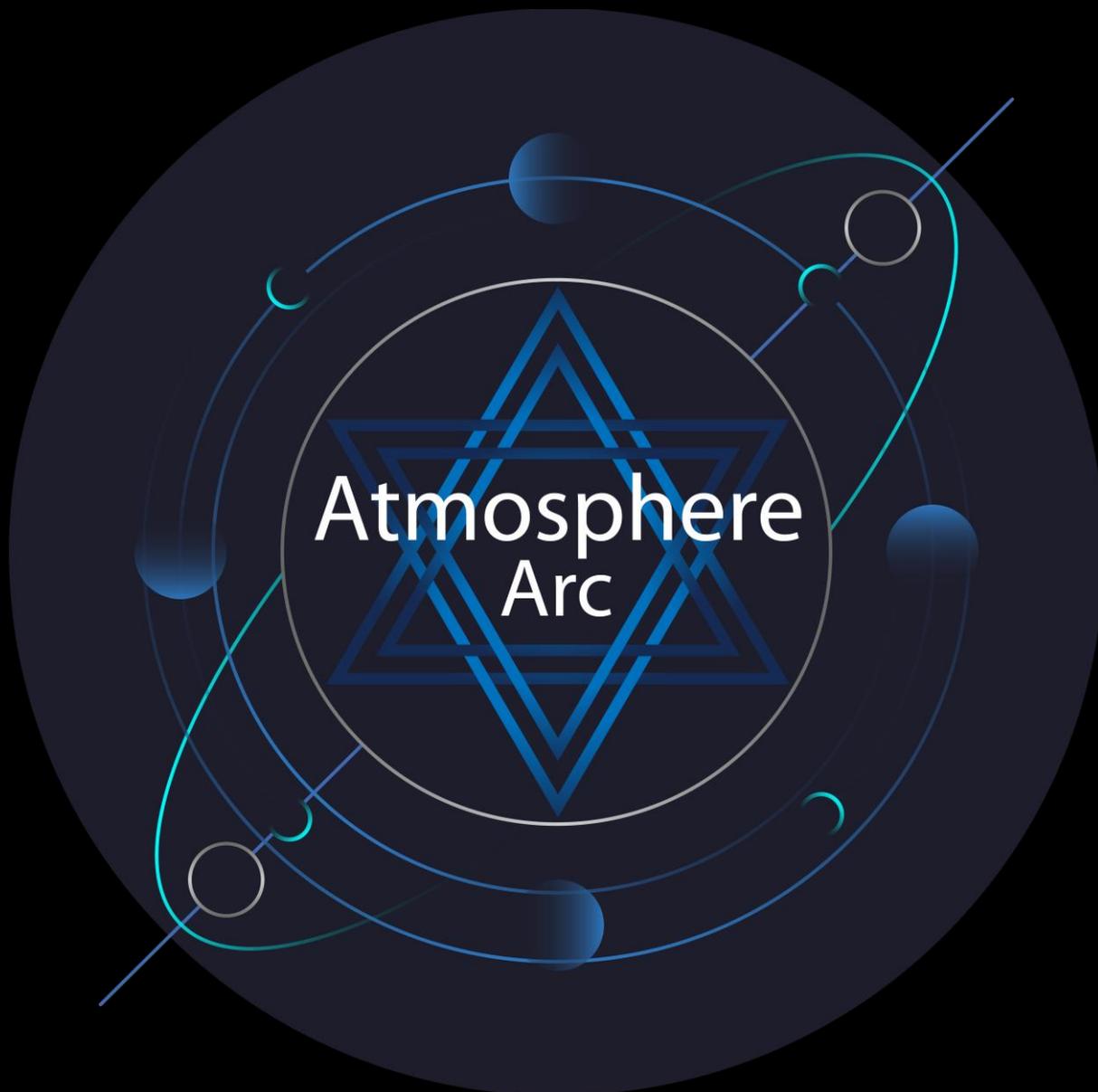


# Privacy and Cookies Policy



Atmosphere  
Arc

**Digital Atmosphere Srls**

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## **Privacy and Cookies Policy**

First of all, your privacy is important to us. Yes, we know that everyone says it, but for us it really is. You have trusted us by using the services of the Platform and we appreciate it very much. This means that we will endeavor to protect and safeguard any personal data you provide to us. We act in the interest of our customers and with transparency regarding the processing of your personal data.

This document describes how we use and manage your personal data. We hope to do it in a clear and understandable way, so as not to get bored in front of meaningless words. In addition, we will provide you with the contact details necessary to contact us if you have questions about your personal data. We will be more than happy to answer you. We also invite you to read the Cookie Policy, which explains how the Platform uses cookies and similar technologies.

If you already know us, you will know that the Platform offers an online booking / purchase service in the sector of products and services of all kinds, provided through our sites and our apps for mobile devices or through other online platforms such as partner sites and social media. Why do we specify it? Because the information below refers to all platforms, to which the same Privacy Policy applies.

This privacy statement is valid for any type of information we collect through these platforms or through other means connected to the platforms themselves (for example the e-mails sent to our customer service team). We hope you won't get bored reading it all too much. If you are one of our business partners, be sure to also read the Privacy Policy for business partners, to know how personal data is processed as part of the corporate collaboration.

Occasionally we may need to modify this Privacy Policy. If you want to stay up to date, visit this page from time to time and you will always know all the latest news. If the changes we make to the Privacy Policy have an impact on you (for example, if we intend to process your personal data for purposes other than those communicated in the past in this Privacy Policy), you will be informed of these changes before the new activities begin.

A necessary note: if you do not agree with this Privacy Policy, you should stop using our services. If you agree, then you are ready to book / purchase the next service and / or product through us!

### **What kind of personal data does the Platform collect?**

We cannot help you book / purchase your perfect service and / or product if you do not provide us with information. For this reason, when you use our services, there is precise information that we have to ask you, for example the name, the contact details, any names of those who could use the service / product in your place and / or together with you and the data for the payment. In addition, we also collect data from your computer, phone, tablet or other device that you use to access our services. This includes the IP address, the browser you use and the language settings. We may also receive information about you through third parties or automatically collect others. This is a basic overview of the information we collect, to meet your needs, even the most specific ones.

### **Because the platform collects and uses your personal data?**

We do it for a good reason: to help you manage your Reservations / Purchases of services and / or products online and to ensure the best possible service. We also use your personal data to contact you and to inform you about discounts and special offers and about other products and services that we believe may be of interest to you. There are also other uses: if you want to know more, contact us.

### **How the Platform shares your data with third parties?**

Different parts are connected to the services offered by the Platform, in various ways and for different reasons. The main purpose is the sharing of data relevant to your service and / or product with the Service Provider and / or product itself to complete the Booking / Purchase. Other parties may also receive some data as involved in the provision of services rendered by the Platform. These include, for example, banking institutions, advertising agencies, subsidiaries of the group to which the Platform belongs and other affiliates of the Platform or, in some cases, if required by applicable law, public bodies or other authorities. We do not sell or transfer your personal data. If you want more details on how the data you have provided us are used contact us.

### **How your personal data is shared within the platform group?**

To find out how your data could be shared with the Platform group, contact us.

### **How the Platform manages the communications eventually sent to the Platform by you and by the supplier of products and / or services that you have booked / purchased?**

The Platform can help you and the Supplier of products and / or services to exchange information and requests regarding the services offered by them or the Reservations / Purchases made. Such exchanges can be made directly through the Platform.

### **How the Platform uses mobile devices?**

We offer free apps through which we collect and manage personal data. The process is similar to what happens through our site, but we also use location services in order to offer you the services close to you and requested by you.

### **What kind of use does the social media platform make?**

The use of social media can be integrated into the services of the Platform in various ways, implying the collection of personal data by us or the receipt of some personal data by the specific social media. If you want to know more about the collection and exchange of this information, contact us.

### **What are the safety and conservation procedures that the Platform uses to safeguard your personal data?**

We rely on all the appropriate and adequate procedures to avoid unauthorized access to data, as well as any improper use of the data we process.

### **How the Platform manages children's personal data?**

Unless otherwise indicated, the Platform offers a service that can only be used by people over the age of 16. We handle information about minors only with the consent of the parents or legal guardian or when the information is provided to us by the parents or legal guardian.

### **How you can check the personal data you have shared with the Platform?**

You always have the right to review your personal data that we have collected. You can request an overview of your personal data by e-mail, by writing to the address indicated for customers.

### **Who is responsible for the management of personal data collected through the platform website and apps?**

Digital Atmosphere Srls controls the management of personal data collected through its sites and apps for mobile devices.

### **What kind of personal data does the Platform collect?**

Do you need more information? Here is a more detailed description of the data we collect.

#### **Personal data you provide to us**

The Platform collects and uses the information you have provided to us. When you make the Reservation / Purchase of the product and / or service, we ask for your name and e-mail address as basic data. Depending on the reservation / purchase of the product and / or service, we may also ask you for your home address, telephone number, payment details, date of birth, the name of any other people who use the service / product. with you and preferences (e.g. service preferences and mobility restrictions).

If you want to get in touch with our customer support team, or contact us by other means (for example on social media or by communicating through us with the Supplier of the product and / or service booked / purchased), we will also collect information through these channels. Customers may also be asked to write a review to help other potential users / buyers of the services and / or products find what they are looking for. We will collect information from you that is included in your reviews, including the display name and avatar if you choose one.

There may also be other cases where you will need to provide us with information. For example, if you are browsing through your mobile device, you can decide whether to authorize the Platform to see your current position or to access your contacts, in order to receive the best experience and service possible (for example, to see our guides of the cities, the nearest bus or metro or train stops, the airports closest to your location or other recommendations). You can also create a user account, which will allow you to save your personalized settings, upload photos, review past bookings / purchases or organize and manage future bookings / purchases or benefit from the other features available only to account holders (e.g. incentives or other benefits we may offer).

You may decide to participate in referral programs or sweepstakes, and even then you may have to provide personal data. Furthermore, you have the possibility to provide us with your opinion or ask for our help regarding the use / purchase of the services and / or products offered by the Platform.

#### **Personal data you provide to us about other people**

It may happen that you do not simply make a Reservation / Purchase of the product and / or service only for you, but also for other people who will do a service with you, or make a Reservation / Purchase of the product and / or service on behalf of a 'other person. In these cases, during the booking / purchase process

you will also need to provide data about them. If you have an account on the Platform, you can also create an address book to simplify reservations / purchases or you can manage other people's reservations / purchases. You can also use the Platform to share information with others, for example by forwarding your wish list or participating in a referral program. In these cases, the information provided will be used only as described in the specific pages of the service, and you can read all the details there.

At this point, we want to specify that it is our responsibility to ensure that the people of whom you have provided data are aware of this, and that they have understood and accepted the ways in which the Platform uses their information (i.e. as described in this Policy on privacy).

### **Personal data that we automatically collect**

Whether or not you complete a Reservation / Purchase of the product and / or service, when you visit our site or our apps we automatically collect some information. For example, your IP address, the date and time of access to our service, the hardware, software or browser you use and information about your computer's operating system, the version of the application and the language settings . We also collect information about your clicks and the pages that have been shown to you.

If you use a mobile device, we collect data that identifies your device, phone settings and features and system activities including app crashes. When you make the Reservation / Purchase of the product and / or service, our system registers the medium and the site through which you have made the reservation / purchase or have logged in to the site or apps of the Platform.

### **Personal data we receive from other sources**

In addition to the information you provide us directly, we may receive other data from various sources, for example business partners such as affiliates, subsidiaries of the group to which the Platform belongs, and other affiliates of the Platform group and independent third parties, and all the information we receive from these sources can be combined with that received directly from you. For example, the booking / purchase services of the Platform are available not only on the Platform itself and its apps, but are also integrated with the affiliate partner services that you can find online. When you use these services, you provide the details of your reservations / purchases to our business partners, who then send them to us. In addition, we rely on external providers to manage payments between users and the supplier of products and / or services: these service providers share information on payments, to help us manage them and take care of your reservation / purchase of the product and / or service , so as to guarantee the best possible experience.

Another example are the communication services integrated into our platforms that allow you to contact the supplier of the product and / or service you have booked for questions regarding their service and / or purchase. When you use these features, in some cases we receive data on communication-related activities (for example where you called, who you are and the date and duration of the call). We may also receive other information in order to show you more relevant advertising content, for example additional data on cookies made available to the Platform by social media partners. When you connect your account on the Platform to that on a social media, personal data is shared with the Platform by the owner of the social media service, but only if you yourself have given your consent. You can always choose not to share this data.

The Supplier of products and / or services shares information about you with the Platform, for example when you have questions about a Reservation / Purchase of the product and / or service in progress, or in case of disputes about a reservation / purchase (although we hope never happens).

### **Because the platform collects and uses your personal data?**

The information we collect about you is used for various purposes. Here's what your data is for:

A. Reservation / Purchase of the product and / or service: first of all, we use your personal data to complete and manage your Reservation / Purchase of the product and / or online service, that is the main purpose of the Platform! This includes sending communications that refer to your Reservation / Purchase of the product and / or service, such as confirmations, changes and reminders.

B. Customer support: through our local offices we provide international customer support in different languages, with the necessary times and on useful days. Sharing your relevant data, such as booking / purchase data or user account information, with our global customer support allows us to be at your disposal when you need us, for example helping you find the Product Supplier and / or right services or by answering any questions you might have about your Reservation / Purchase of the product and / or service or other topics.

C. Account: users of the Platform can create a user account on our website or apps. We use the information you provide to manage your account, allowing you to have many useful features. You can manage your Reservations / Purchases of the product and / or service, take advantage of special offers, make Reservations / Purchases easily and manage your personal settings. Choosing personal settings can allow you to manage and share lists, see the Services and / or Products previously searched for, share photos, check other information relating to the products and services and see the reviews you have sent. If you want, you can share some information of your user account by creating a public profile associated with your real name or a username of your choice.

D. Online Groups or Forums: We may allow users with an account to join online groups or forums and interact with other users.

E. Marketing activities: we also use your information for marketing activities, including for example:

1. Use your information to send you periodic news about products and services. You can unsubscribe from marketing communications at any time quickly and easily. You just have to click on the "unsubscribe" link found in every newsletter or other communication.
2. Based on the information you share about yourself, we may show you personalized offers on the Platform site, on apps or on third-party sites / apps (including social media sites) and the content of the site you view may be customized. They may be offers to book / buy directly on the Platform site, on co-branded sites, or other offers or third-party products that we think may interest you.
3. When you participate in promotional activities (for example lotteries, referral programs or prize games), the information about it will be used to manage your participation in these promotions.

F. Communications with you: it may happen that you contact us by e-mail, post, telephone or SMS, depending on the contact method you have chosen. In addition, we will have to manage the communications that you send to us, for example in the following cases:

1. Respond and manage requests from you or the Supplier of products and / or services that you have booked / purchased. The Platform offers guests and the Supplier of products and / or services different ways, directly through the Platform itself, to exchange information, requests and

comments on their offers and on the Reservations / Purchases of the product and / or service made. For more information, scroll down and read the section "How does the Platform manage the communications sent by you and the Supplier of products and / or services you have booked to the Platform?".

2. If you have not completed a Reservation / Purchase of the product and / or online service, we may contact you with an invitation to complete the reservation / purchase. We believe this is a useful additional service that allows you to go ahead with a Reservation / purchase without having to search again for the Supplier of the product and / or service or enter the reservation data again.
3. When you use our services, we may send you a questionnaire or invite you to provide a review of your experience with the Platform or the Supplier of products and / or services in order to improve our services.
4. In addition, we send you other material relating to your Reservations / Purchases of the product and / or service, for example indications on how to contact the Platform in case of need while you are traveling, or useful information that could be useful for organizing and living better. your service. We also send you material on Reservations / Purchases of active products and / or services or a reminder of previous reservations / purchases made on the Platform.
5. 5. Even if you do not have Reservations / Purchases of active products and / or services, we may need to send you other administrative messages, for example security notices.

G. Market research: sometimes we ask our customers to take part in a market research. Please read the information provided when you are invited to participate in order to understand what personal data is collected and how it is further used.

H. Improve our services: we also use personal data for analysis purposes, in order to improve our services and enrich the user experience. The data can also be used for testing purposes, for troubleshooting and to improve the functionality and quality of our online services. The main objective is to optimize and customize our online platform according to your needs, making it easier and more pleasant to use. We undertake to use pseudonymised data only for analytical purposes.

I. Guest reviews and other information on services and / or products: During and after the service and / or product booked / purchased with us you may be invited to leave a review. We may also give the opportunity to leave a review to those who use the service with you or to the people for whom you have booked / purchased. This invitation requires information about the Service Provider. Account holders can choose to show a review with a username (of your choice and to be set in the account area) instead of the real name. In addition, account holders can also choose to show the review as anonymous. There is also the possibility of adding an avatar. By completing a review, you agree to make it viewable (as described in detail in our Terms and Conditions), for example, on the relative page of the Supplier of products and / or services, on our site or on our apps, on our profiles and on social media apps, on the online platform of the product and / or service provider or of the commercial partner. The aim is to inform other users of the products or about the quality of the Service, the commercial premises you have chosen or the other experiences you have decided to share.

J. Monitoring of calls: when you call our customer support team, the Platform uses an automatic detection system to associate your phone number with your active reservations / purchases, to save you and the support staff time. Our operators may still ask you to identify yourself, to ensure that the data of your booking / purchase remains confidential. During phone calls with the customer support team, a call listening or recording system may be activated for the purpose of quality control and operator training, which include the use of recordings for the purpose of handling complaints and fraud detection. Not all

phone calls are recorded and the recordings are kept for a limited period of time and then automatically deleted later, unless the Platform has a legitimate reason to keep them longer, for example in the case of fraud investigations or according to the law.

K. Promote a safe and reliable service: in order to create a reliable environment for you, for your companions who use the services / products, the commercial partners of the Platform and the suppliers of products and / or services, we use personal data to reveal and prevent fraud and other illegal or unwanted activities. Similarly, we use personal data for risk and security analysis purposes, including for making reservations / purchases and user authentication. For these purposes, we may be required to block or place certain reservations / purchases on hold until our analysis is complete.

L. Legal purposes: finally, in some cases, we may need to use your information to manage and resolve legal disputes, government investigations and compliance checks, to enforce the terms of use of the Platform's online booking service or to comply to legitimate requests from public authorities.

The communication of personal data to the Platform is on a voluntary basis. However, depending on the type of service you want to use, we may only be able to offer it if certain personal data is collected. For example, we cannot process your Reservation / Purchase of the product and / or service if we do not collect your name and contact details.

If we use automated means for the processing of personal data that produce legal effects or that significantly affect you, we will take appropriate measures to safeguard your rights and freedoms, including the right to obtain human intervention.

### **To manage your personal data as described so far, we rely on the following principles:**

With regard to purposes A and B. Digital Atmosphere uses as a legal basis the need to process personal data for the execution of the contract, specifically to finalize and administer your Reservation / Purchase of the product and / or service. If the necessary personal data are not provided, the Platform cannot complete the Reservation / Purchase of the product and / or service, and cannot provide customer service. As for the purposes from C to K, Digital Atmosphere relies on its legitimate commercial interest to provide its products and / or services, prevent fraud and improve services. When personal data are used for the legitimate interest of the Platform or of a third party, the Platform will in any case balance your rights and interests for the protection of your personal data and the rights and interests of the Platform or of the third party. As regards purpose L, the Platform relies, where applicable, on the fulfillment of its legal obligations (for example, legitimate requests from public bodies). Where required by applicable law, the Platform will request your consent before processing your personal data for direct marketing purposes.

If you wish to object to the processing described in points C to K and no direct opt-out mechanisms are available (for example in your account settings), please contact us using the email address on the platform.

### **How the Platform shares your data with third parties?**

In some cases we will share your personal data with third parties.

1. The supplier of products and / or services booked: this is a crucial aspect for our work! To complete the Reservation / Purchase of the product and / or service, we must transfer the relevant data to the Supplier of products and / or services that you have booked / purchased. Depending on the Reservation / Purchase of the product and / or service and the Supplier of the products and / or services, this may include your name, contact details and payment, the name of the guests who use

the service with you or booked / purchased by you for them and the preferences or other information that may be indicated when you have made the Reservation / Purchase of the product and / or service. If you have questions about your product and / or service, we may need to contact the Service Provider and ask them to handle your request. Unless payment is made during the booking / purchase process through the Platform website, we will have to forward your credit card data to the Supplier of the products and / or services you have booked / purchased to manage the payment itself (admitted that you provided the data during the booking / purchase process), instead of paying directly at the time of booking / purchase (recommended choice). In case of disputes regarding the booking / purchase, we may need to provide the Supplier of the products and / or services with the necessary information on the booking / purchase process to manage the dispute, for example a copy of your booking / purchase confirmation as proof the actual existence of the Reservation / Purchase of the product and / or service.

2. The local platform office: to ensure support for the use of the platform services, your data may be shared with companies that are part of the same group as the platform, which act as the platform's service provider, including included in connection with customer service. To find out more about the companies in the platform group, visit the [About Us](#) section.
3. Third-party services: we use service companies, which are not part of the group to which the Platform belongs, to receive support in the provision of the Platform services. These service companies provide services like:
  - customer support
  - market research
  - fraud detection and prevention services, including anti-fraud checks
  - payment services. We use third parties to process payments, manage cancellations or provide invoice collection services. When you or the credit card holder used for the Reservation / Purchase of the product and / or service request a cancellation for your reservation / purchase, we need to share some information about the reservation / purchase with the payment service provider and with the specific financial institution, in order to manage the transfer. For example, we may share a copy of your booking / purchase confirmation or the IP address used to book / purchase. We may share information with the specific financial institution if we believe it is absolutely necessary for the purpose of detecting and preventing fraud.
  - marketing services. We share personal data with marketing partners, including email addresses, as part of the Platform's marketing services through third parties. We do our best to share e-mail addresses in encrypted form with an existing customer database, so that e-mail addresses cannot be used for other purposes. For more information on personalized advertising and your options, read the paragraphs "How are cookies used?" and "What are your options?" of our Cookie Policy.

All service providers are asked to carefully safeguard your personal data.

4. Competent authorities: we share personal data with law enforcement agencies when required by law or if absolutely necessary for the detection, prevention or conduct of legal proceedings against fraud or crimes, or if we are otherwise required by law . We may have to share personal data with the competent authorities to protect and defend our rights or assets, or the rights and assets of our business partners.

5. Business Partners: We try to work with many business partners around the world. These business partners distribute or market the Platform's services, including the services and products of our Suppliers.

When you book / purchase on one of the sites or on an app of one of our business partners, some data you provide, such as your name, e-mail address, your address, payment details and other relevant information, will also be shared with us to complete and administer your Reservation / Purchase of the product and / or service. If customer support is provided by the partner, the Platform will share the data relating to your booking / purchase with the partner (if and when necessary) in order to provide you with appropriate and efficient support. When you book / purchase through the site of one of our business partners, the latter may receive some of your personal data related to the specific booking / purchase, such as your name and e-mail address. This occurs for their internal purposes (for example for analysis purposes) and, if requested by you, also for the management of loyalty programs or for marketing.

When you book / purchase on a commercial partner's site, we invite you to read their privacy information in case you want to better understand how your personal data will be managed. For the purpose of detection and prevention of fraud, and when absolutely necessary, we may also exchange information about our users with our possible business partners as indicated on the platform under partner.

The transmission of personal data as described in this Privacy Policy may include the overseas transfer to countries that do not provide for comprehensive and complete data protection laws such as those of the European Union countries. Where required by Community law, we will only transfer personal data to recipients who offer an adequate level of protection of personal data. In such circumstances it may be necessary to establish contractual measures to ensure that data protection is in line with European standards. You can ask to view a copy of these contractual agreements by contacting us in the manner described above.

### **How your personal data is shared within the Atmosphere Arc group?**

The Platform is part of the Atmosphere Arc ecosystem. On the website and via google you can find more information.

We may receive your personal data from other companies of the platform group or share your data with them for the following purposes:

- A. to provide services (including making, managing and managing reservations / purchases or managing payments);
- B. to provide customer support;
- C. to detect, prevent and investigate cases of fraud, data breach and other illegal activities;
- D. for analytical purposes and for the improvement of products / services;
- E. to provide personalized offers or send you promotional material with your consent, unless otherwise permitted by applicable law;
- F. to ensure compliance with applicable laws.

Unless otherwise indicated, as regards the purposes from A to E, the Platform relies on its legitimate interest to share and receive personal data. As regards purpose F, the Platform relies, where applicable, on the fulfillment of its legal obligations (for example legitimate requests by law enforcement agencies).

All companies that are part of the Atmosphere Arc group may need to transfer customer personal data to ensure the protection of their users against fraudulent activities on their online platforms.

**How the Atmosphere Arc manages any communications sent via the Platform by you and the supplier of products and / or services that you have booked / purchased?**

Atmosphere Arc can offer you and the Supplier of products and / or services different communication channels (present on the Platform itself) regarding the Reservation / Purchase of the existing product and / or service. Through your profile area, the Platform app and through other channels that we may make available, you and your Supplier of products and / or services can contact the Platform for questions about your Reservation / Purchase of the product and / or service.

The Platform accesses communications and uses automatic systems to review, scan and analyze the communications for security purposes, fraud prevention, compliance with legal and regulatory requirements, investigations into potential crimes, product development and improvement, research, customer involvement , for example by providing you with information and offers that we think may interest you, and customer or technical support. We reserve the right to block the delivery of communications, or to carry out checks, if we deem it necessary at our discretion, for example if we think it may contain harmful content, spam or any type of risk for you, for partner structures, for the Platform or for others. Remember that all communications sent or received through the tools of the Platform will be received and stored by Digital AtmosphereAtmosphere. The commercial partners with whom you have booked / purchased and the Supplier of products and / or services may decide to communicate directly with you by e-mail or other channels beyond the control of the Platform.

**What type of use does the Mobile Device Platform do?**

We offer free apps for different types of mobile devices, as well as versions of our site optimized for browsing via smartphone or tablet. These apps and mobile sites manage the personal data you provide in the same way as the website, and also allow you to use location services to search for the closest product and / or service if you want it. With your consent, we can also send you push notifications with information about your Reservation / Purchase of the Product and / or Service. You can also authorize our access to your position or to your contacts in order to offer you the services you requested. Read the instructions of your mobile device to change the settings and activate the sharing of this data or the reception of push notifications.

We can use a so-called cross-device tracking mode to optimize our services and marketing activities, whether or not through the use of cookies. For more information on cookies and similar technologies, read the Cookie Policy. With cross-device tracking, the Platform can track user behavior on different types of devices. As part of the cross-device tracking activities, the Platform can combine the data collected from a particular browser or from a mobile device with another computer or device connected to the computer or device from which the data was collected.

To optimize the contents of the Platform newsletter, Atmosphere Arc combines the searches and reservations / purchases you make from different computers and devices. You can unsubscribe from the Platform newsletter at any time.

On other sites and apps you may see personalized advertisements, including offers based on your activities on connected computers and devices. By changing the cookie settings on your device (see our Cookie Policy under "What you can choose"), you can change the cross-device tracking settings for advertising purposes.

Remember, if you sign out of your account, this does not mean that you will no longer receive personalized advertisements.

### **What kind of use does the social media platform make?**

We of the Platform use social media in various ways, for example to facilitate the use of the online booking / purchase service, to promote the products / services of our Suppliers and to advertise, improve and facilitate the use of our services. You can choose not to use the social media option.

1. Login with your social media account. We offer you the possibility to access the Platform account through your social media account, so you won't have to remember many usernames and passwords for the different online services. After logging in for the first time, you can always use your social media account to log in to the Platform. You can still decide to separate the two accounts at any time.
2. Integration of social media plugins. We have integrated social media plugins on the website and on the platform apps. This means that when you click on one of the buttons (for example, Facebook's "Like"), some information is shared with the social media service providers. If you are also logged into your social media account at the same time, the social media service provider may link this information to your social media account, display it on your social media profile and share it with other people in your network of contacts.
3. Other social media services and features. We may integrate other social media services (such as a message exchange system) to interact with the Platform or with your contacts regarding our products and / or services. We may also be present managing social media accounts and offering apps on different social platforms. If you choose to connect to the Platform via social media, your social service provider may allow you to share information with the Platform. If you opt for sharing, your provider will usually tell you what information will be shared. For example, when you access your account on the Platform through your social media account, some information (based on the permissions you have provided to your provider) may be shared with the Platform. Among them, your e-mail address, your age or profile photo as you have set in your user account.

When you register on a Platform social media app or connect to a message exchange system without having a Platform account, the information you decide to share may include the basic information available on your social media profile (including the email address, status updates and your contact list). We will use this information, for example, to provide you with the product and / or service you have requested, to forward a message you want to send to your contacts or to create a personalized user experience in the app itself or on our site. We can, therefore, if you request it, customize our services according to your needs, offer you and your friends the best offers of products and / or services and analyze and improve our services. Your social media service provider will be able to provide you with more details on how it uses and manages your data when you connect to the Platform via the social network itself, for example by combining the personal data they collect when you use the Platform through them with the information from them. collected when you use other online platforms connected to your social media provider.

### **What security and data retention procedures does the Platform put in place to safeguard your personal data?**

We rely on specific procedures to prevent unauthorized access to data, in addition to their improper use.

We use specific systems and procedures in the sector to safeguard the personal data you provide us. We also rely on security procedures and physical technical limitations in order to prevent access and use of the personal data contained on our servers. Only authorized personnel can access personal data while carrying out their work.

We keep your personal data for as long as we consider necessary to allow you to use our services, to provide you with our services (including for the maintenance of the online user account, if created), to comply with applicable law, to resolve disputes with any party and if otherwise necessary to allow us to conduct our business, including to prevent and reveal fraud or other illegal activities. All personal data stored by us are governed by this Privacy Policy. If you have questions about a specific data retention period for certain types of personal data processed by us, please contact us using the contact details provided.

### **How the Platform manages children's personal data?**

The services offered by the Platform are intended only for people over the age of 16. For people under the age of 16, the use of our services is allowed only with the consent of the parents or legal guardian. The Platform may collect and use information from minors only with the consent of the parents or legal guardian and in limited cases such as for a reservation or purchase of other services related to the product and / or service, or in other exceptional cases (for example specific functions for families). If we become aware of the processing of data of people under 16 years of age without the valid consent of a relative or legal guardian, we reserve the right to delete such data.

### **How you can check the personal data you have shared with the Platform?**

We want you to have control over how we process your personal data. You can do this in the following ways:

1. you can request a copy of your personal data in our possession;
2. you can inform us of any changes to your personal data, or you can ask us to correct any of your personal data in our possession; however, as described below, you may be able to make the changes yourself;
3. in certain circumstances, you can request us to cancel, block or limit the processing of your personal data in our possession, or to oppose particular methods of processing your personal data; and
4. in certain situations, you can also request the transmission of your personal data to third parties.

When we use your personal data on the basis of your consent, you have the right to withdraw this consent at any time under applicable law. Furthermore, when we process your personal data on the basis of a legitimate interest or a public interest, you have the right to object at any time to the use of your personal data under the applicable law.

We count on you to make sure that your personal data is complete, accurate and current. Please inform us immediately if there are any changes or inaccuracies about your personal data.

If you have an online user account, you can access a large amount of personal data concerning you through our apps / sites. Our apps / sites generally present you with the ability to add, update or remove information about you.

If any personal data about you is not accessible via the app / site, you can send us a request at no cost. For any request relating to this Privacy Policy and to exercise your rights or if you want to make a complaint, please contact our Data Protection Officer at our institutional email that you find on the site indicating in the subject dataprotectionoffice. You can also contact your national data protection authority.

If you wish to object to the processing of your personal data on the basis of a legitimate interest and if direct opt-out mechanisms are not available, please contact us at our institutional email.

### **Who is responsible for the processing of personal data on the website and on the platform apps and how to contact us?**

The Digital Atmosphere company controls the management of personal data as described in this Privacy Policy. It is a private limited liability company subject to Italian laws and with registered office at the address indicated on the first page of this document and on the website.

If you have any questions about this Privacy Policy or about the processing of your personal data, send an email to our Data Protection Officer and we will contact you back. For questions about reservations / purchases, contact us via our customer support page.

### **Cookies Policy**

Whenever you use our online services, including our applications, cookies and other tracking technologies are used for various reasons, for example to operate the Atmosphere Arc website, to analyze traffic or for advertising purposes. These technologies can be used directly by us or through our business partners, including external service and advertising providers we work with. If you want to know more about cookies, how they are used and what your options are, read more.

What is a cookie?

How are cookies used?

What are your options?

### **What is a cookie?**

A cookie is a small piece of data that is stored in the browser of your computer or mobile device. The so-called "proprietary cookies" are those attributable to the operator who is currently managing the site that released the cookie. The platform's cookies are therefore "proprietary cookies". In the event that we also authorize other parties to release cookies through the Platform's sites and apps, those cookies are called "third-party".

Then there is a further difference between session cookies and persistent cookies. Those of the session have a limited duration and are deleted when the browser is closed, while the permanent ones have a longer duration and are not automatically deleted when the browser is closed. We do our best to use or grant authorization to cookies with a maximum duration of 5 years. Only in exceptional cases, for example for security reasons and when strictly necessary, a cookie can have a longer duration.

In addition to using cookies, we also use similar technologies. These include "web beacons" (also known as pixel tags, web bugs or gifs), tracking URLs or SDKs (application development packages). A web beacon is a small graphic object consisting of a single pixel that arrives on your computer as part of a web page, an app,

an advertisement or via an e-mail in HTML format. Pixels can be used to collect information on your device, for example the type, operating system, IP address and time of the visit. They are also used to release and read cookies in your browser. Tracking URLs are used to determine from which site your visit to the platform site or apps originated. Finally, the SDKs are small portions of code included in the apps, which work like cookies and web beacons.

In this Cookie Policy, all of these technologies are called "cookies".

### **How cookies are used?**

Cookies are used for several purposes. Cookies allow you to be recognized as a unique user when you visit the different pages of a site, different sites or when you use the apps. The types of information we collect through cookies include the IP address; Device ID, pages visited; browser type; navigation data; operating system; internet service provider; time stamp; if you responded to an ad; Reference URL; functions used and activities carried out within the websites / apps.

Our site and apps use cookies for the following purposes:

**Technical cookies:** we want to offer our visitors a cutting-edge and easy-to-use site that automatically adapts to their needs and desires. To make this happen, we use technical cookies to allow you to view our website, make it work properly, create your account, log in and manage your reservations / purchases. Technical cookies are essential for the proper functioning of our site.

**Functional cookies:** we use functional cookies to remember your preferences and to help you use our website and apps effectively and efficiently. If you use the Platform's websites and apps to search for a product and / or service, these cookies are for example able to store the currency and language you prefer, your searches and the suppliers of products and / or services that you previously viewed. We may also use cookies to remember your registration information, so you will not have to enter your access data every time you visit the site. The passwords are in any case always encrypted. Functional cookies are not essential for the operation of our site or app, but they add functionality and improve your overall experience on the Platform.

**Analytical cookies:** we use analytical cookies to better understand how our visitors use the Platform site, to understand what works and what does not, to optimize and improve the site and apps, to measure the effectiveness of marketing and communications and to make sure that the platforms are always interesting and relevant. The data we obtain include the web pages you visit, the exit and entry pages, the type of platform, which e-mails you have opened and information on the date and time.

This type of cookie also allows us to know how you interact with the site, for example through the number of clicks you make on a given page, mouse movements, scrolling, the words you search for and the texts entered in the various fields. We also use analytical cookies in the context of our online advertising campaigns, to understand how users interact with our site or apps following the display of an online advertisement, including advertising on third-party sites. Even our business partners may use analytical cookies to find out if their users take advantage of the offers integrated on their sites.

**Commercial cookies:** we use our and third-party cookies to place personalized advertisements on our and other websites. This practice is called "retargeting" and is based on browsing activities, such as the destinations you have searched for, the structures you have viewed and the prices that have been shown to you..

## **What are your options?**

To find out more about cookies and how to manage or delete them, on the web, as well as on your browser, you will find a lot of information. Among browser settings such as Internet Explorer, Safari, Firefox or Chrome you can choose which cookies to accept and which to refuse. To find out where you can find these settings, which may vary depending on the browser used, use the "Help" or Help "function of your browser.

If you decide not to accept certain technical and / or functional cookies, you may not be able to correctly use some functions of our site. At the moment, the "Do Not Track" function offered by some browsers (called "Do not track", "Do not perform any tracking" or other depending on the type of browser) does not work on our site. In the event that a common standard is established regarding the application of the "Do Not Track" function, then we may revise this Cookie Policy again.

Advertising: when we have to choose an advertising and marketing company, we need to analyze the NAI (Network Advertising Initiative) and / or the IAB (Interactive Advertising Bureau). NAI and IAB members adhere to industry standards and codes of conduct and also offer an opt-out (unsubscribe) function from behavioral advertising.

To cancel a NAI member's participation in the behavioral advertising program, put a check mark next to the name of the company for which you want to unsubscribe. Visit [www.youronlinechoices.com](http://www.youronlinechoices.com) or [www.youradchoices.com](http://www.youradchoices.com) to find out how to cancel participation in personalized advertisements. Your device settings may allow you to limit the sharing of information for retargeting purposes. Keep in mind that unsubscribing from the ad network does not imply that you will no longer receive or that you will no longer be the recipient of online advertising or marketing analysis activities. In fact, the cancellation only means that you will no longer receive personalized advertising based on your preferences and your behavior on the web by the network from which you have excluded yourself.

Analysis: to monitor the collection of data for the purposes of analysis carried out by Google Analytics through the various browsers, visit the Add-on page for deactivating Google Analytics (available only from a desktop computer).

If you have any questions regarding this Cookie Policy, please send an email to our website email address. This Policy may be changed in the future, therefore visit this page regularly for all updates.