PRIVACY INFORMATION NOTICE

Introduction

Full ownership of this website is retained **by I.T.C srl – Italy Travel Consulting, Via della Rustica 273/B, 00155 Roma**, operating within the tourism organization and intermediation industry.

This document constitutes information to be provided to the data subjects under art. 13 of European Regulation n. 679/16 and in accordance with the principles applying under the The United States of America legal system; it applies to this website, with the exception of the website of third parties to which reference may be made by means of links or banners.

1. Controller

In accordance with art. 24 of European Regulation 2016/679, full ownership of this website is retained by:

I.T.C. srl - Italy Travel Consulting, Via della Rustica 273/B, 00155, Tel.: +39 06 2290226, email: info@itctravel.tours; fiscal cod and VAT number: 14888201002; PEC: itcsrlitalytravelconsulting@pec.it, which acts in its capacity as controller ("**Controller**") and undertakes an obligation to ensure protection of the data provided by Users.

3. Types of data processed

Throughout the navigation the Controller executes the processing of the personal data belonging to the users who navigates the website.

In particular:

3.1. Data collected in an automated manner throughout the website navigation

Informatic Systems and softwares utilized by this website collect some personal data the acquisition of which is implied by the use of the usage protocols of internet. In spite of the fact that these pieces of information are not explicitly collected for the purposes of identifying the User of the Website, they might be used, in consideration of the type of the information, to allow to identify users through elaborations and associations with data retained by third parties. This category comprises the IP addresses or domain names of the devices utilized by the Users of the Website, the URI addresses of the requested resources, the timing of the request, the procedure utilised in submitting the request to the server, the size of the file obtained with the reply, the numeric code indicating the status of the reply provided by the server by the Countty of origin, the characteristics of the browser and the operational system utilized. These data may used solely to obtain statistics-related anonymous information concerning the usage of the website and its proper functioning.

They may not be utilized to allow the identification of the user by the Controller.

3.2 Identification data disclosed by the user on voluntary basis

This category comprises Personal Data such as: email address, which is requested by means of an apposite registration form to be filled in order to have personalized access to the Web Site and receive free of charge communications via the newsletter managed by the website. During the registration process the following data will also be requested: name, surname, city and other data relating to preferences that user may decide to enter. Such data, disclosed by the user on voluntary basis, shall be stored and processed by the Controller solely for the purposes of allowing personalized access to the web site and managing the newsletter service along with other services the User may request: such data may not be transferred to third parties, not even free of charge, and will be stored by using encryption technologies so as to impede third parties from having access to the data of the Users. The data collected shall not result in any profiling activity, except for the profiling cookies as per the cookies information notice in this website.

4. Informazioni relative all'attività dell'utente sul Sito

Data concerning the usage of the website by User are collected in an anonymous and aggregate manner, with tracking systems other than cookies, for the purpose of obtaining information concerning preferences and behaviors of the user while navigating this website. The user, when having its first access to the website, shall be provided with a code (ID) created based on a randomized and anonymized algorithm, which will not vary during the following accesses. This will allow a research on the preferences of the user itself. In case that the user no longer has access to the website, the ID Code shall be erased as a consequence of not being utilized for six months. The user may also erase this anonymized tracking instrument by erasing the chronology and the cache, using the opposite tools of the browser.

5. Personal data concerning tastes and preferences

Following the tracking system as per the above art. 4, activities undertaken by the user who has a personalized access shall be monitored. To this end, an ID code is to be used; such code will not vary when the user will have access to the website. This will allow to conduct a research on the preferences of the User itself. The ID Code shall be erased following personal account of the user being deactivated.

6. Purposes of personal data processing

The expression "Purposes of personal data processing" is being used to indicate the reasons why Italy Travel consulting S.r.l. processes personal data in its website

The purposes pursued by the processing of personal data and its legal basis are the followings:

a. Operative management of the website navigation

Personal data, especially the data collected in an automated manner throughout the navigation (3.1), allow the website to function and enhance the services provided. Such processing is necessary in order to the deliver the requested service and does not require consent by the data subject.

b. Data elaboration for statistics-related purposes.

Statistics analysis are performed, along with the services provided by third parties, with regard to the usage of the website. Such analysis, performed in an aggregated and anonymous manner, allow to obtain information which are highly important to ensure a proper functioning of the website. In particular, information is collected with reference to the contents most frequently visualised, the interests of the users in terms of web contents, the trend of the visualizations. Such data processing is necessary in order to provide with the requested services and does not require consent by the user, when an agreement is entered into with the supplier, as third party, not to share anonymous data (Google).

c. Measurement of traffic data

The website monitors and analyses the traffic data with reference to the webpages browsed and to the contents used by means of the instruments provided by third companies: the purpose is to assess the satisfaction with the website and its services. Such information is collected via anonymized and aggregated techniques, nevertheless it is acquired by third parties who may elaborate the information to the extent that user may be identified. This processing is necessary to enhance the requested service, and requires prior consent by the data subject. The legal basis lies in the consent itself of the data subject.

d. Creating a custom account

Users may create their own personal account to have a personalized access to the website. Registration ensures that the information be adherent and provides with the possibility to interact with the editorial board of the website.

Further information relating to the name and the address may be entered on a voluntary basis and is aimed at providing the registered users with the news and information of their interest. Throughout the registration process, the users will accurately be informed of the marketing purposes and of any profilisation which requires specific consent. Users who, throughout the

registration, opt to receive the newsletter will receive communications and updates by the website at their email address, in accordance with this policy.

e. Rights judicial protection
ITC Italy Travel consulting S.r.l may process personal data in order to enforce its own rights before the relevant judicial and administrative authorities.
f. Compliance with legal obligations as set forth under the applicable laws and regulations, also with reference to accountancy and tax.
The Law imposes specific obligations involving the data processing as well. The legal basis is the compliances with mandatory rules.
This information notice is provided solely with reference to this website, no reference being made to any other website that the users may consult via links.

7. Methods of processing and storage time
The Controller performs the processing of personal data in an automated manner by means of electronic tools and in compliance with security requirements tailored on the specific processing. Security measures relating to personal data aim at minimizing the risks of disruption and/or loss, aven by accident, and/or unauthorized access and/or unauthorized processing and/or processing not compliant with the purposes of the collection. Security measures are constantly monitored and periodically verified and may be performed with the support by specialized third parties.
The Controller stores the personal data of the registered users from the date of registration in order to comply with the obligations as set forth by laws and regulations, to enforce rights, to prevent frauds or apply this Privacy Policy, in an automated manner, limited to a strict minimum for a period of six months running from the personal account deactivation.
Please refer to our Cookie Policy as concerns the duration of cookies storage as well as other tracking systems.

8. Recipients of personal data
Personal data may be disclosed to specific recipients so as to properly perform all the above mentioned processing-related activities. Recipients may process personal data acting in their capacity as Processors, namely service suppliers who allow the Controller to provide with the requested services, or in their capacity as Authorized Persons, namely appropriately trained persons who process personal data solely when explicitly appointed and authorized to this end.
In order to receive an updated list of the processors, along with a list of the recipients of the personal data, users may reach out to the Controller via the hereunder email address.

9. Place of data processing
Personal data shall be processed by ITC Italy travel consulting S.r.l. mainly in Italy, at its registered office, by means of digital archiving and custody on specific servers.

10. Liaison with third party websites
Through the website of ITC Italy travel consulting s.r.l. it is possible to liaise with third party websites by using specific links.
The Controller declines any responsibility with regards to any request/disclosure of personal data to third party websites and with regards the management of any authentication credentials provided by third parties.

11. Right to erasure (right to be forgotten)
Any request concerning the right to erasure relating to personal data featuring in newspapers may be sent to the following email address: itcsrlitalytravelconsulting@pec.it.

12 User rights

In addition to the right to be informed about reasons because of which the processing of personal data is performed, the user also hold the following rights:

- right of access;
- right to rectification;
- right to erasure;
- right to data portability, namely the right to request that data be transferred directly to another company, when it is technically possible;
- right to objection, namely the right to request that data be not utilized;
- right not to have data treated in automated manners, such as profilisation.

The exercise of the above-mentioned rights is free of charge and does not require any specific manners.

In order to exercise their rights, users may contact ITC Italy Travel consulting S.r.l. in its capacity as Controller at the following email address: info@italytravelconsulting.it.

12. Information notice

Any amendment to the applicable law may result in this document being amended. We accordingly invite users to consult this web page periodically. It will be our care to directly inform users in case of of any substantial change.