



## Privacy Notice

In accordance with Art. 4 of the General Data protection Regulation 2016/679, the Data Controller is your employer.

The data processor is UVET GBT, with registered office in Bastioni di Porta Volta, 10, 20121 Milan.

UVET GBT, as Data processor, in compliance with the provisions of art. 28 of (EU) GDPR 2016/679, wishes to provide some information about the processing of the data provided by the Controller for the supplying of the service.

Please refer to the Data Controller's privacy notice for more detailed information.

### 1. Personal data collected

The data and personal information collected are those communicated by the employer and those entered by the user in the "traveler profile" form. These include:

- Name, date of birth, gender, e-mail address, telephone number
- Credit Card Number
- Travel and accommodation information
- Passport and / or identity card data
- Specific travel requests (particular foods, etc.)

Any particular data communicated will be used only for the specific purposes for which they are provided by the Data Controller and in compliance with the Data protection agreement

**The provision of data is optional, but its absence determines the inability to provide the service required by the Data Controller.**

### 2. Purposes of data processing

The data and information provided for the supplying of the service required by the Data controller and in compliance with the Data protection agreement, are processed for:

- process travel bookings
- Make and modify travel reservations.
- perform billing and accounting functions related to the travel
- issue tickets and other travel-related documents on behalf of travelers

In general, the data are processed for the fulfillment of the obligations deriving from the contract for the supply of business travel services , and for the fulfillment of obligations established by laws, regulations and Community legislation.



### 3. **Scope of communication and dissemination of data**

The data may be disclosed:

- to the authorized UVET Group personnel appointed to perform the corresponding treatment operations;
- to associated companies and internally between the companies of UVET Group, for the performance of the service;
- to all natural and / or legal persons, public and / or private, when the communication is necessary or functional to the performance of our activity for the purposes outlined above. In particular, the data may be communicated to companies active in the tourism sector, such as: airlines, vehicle rental companies, hotels, etc. (**travel service providers**) for the purpose of executing contracts signed with travelers;
- To perform the requested service, such data must be communicated in clear to third parties, is carriers in general, hotels, car rental companies, loyalty programs (frequent flyers and similar) run by carriers, hotel chains and - in general - operators in the travel industry to which the person concerned had been registered for, to the employer or persons designated by him for any authorizations, to third parties in general for purposes connected with or dependent on the execution of the contract with your company, credit card service providers, ATM/Bancomat service providers, service providers paid by credit card or debit card;

Visa and passport service providers, application and software developers and vendors providing IT support, data hosting, and collection services.

These suppliers access information only if necessary for the performance of their functions, as per our indications in contracts with them.

### 4. **Data retention period**

Your data will be kept for the period required for the purposes described in this statement or to the extent necessary to fulfill specific legal obligations (eg Article 2220 Civil Code on the conservation of accounting records) or resolve disputes, and in accordance with the provisions of the Data protection agreement between Uvet Group (as Data processor) and the Data Controller.

### 5. **Your rights**

You have the right to exercise the rights referred to in Articles 15, 16, 17, 18, 19, 20, 21 of Regulation (EU) 2016/679 (GDPR) including the right of access, rectification, deletion of data, limitation of processing, to obtain that the data are transmitted directly to another data controller, to oppose at any time the processing of data concerning him, as well as the right to file a complaint with the supervisory authority.

You may address your recognized rights to the Data Controller, using its means. Please refer to the Data Controller's privacy notice.

### 6. **Security measures**

To guarantee the integrity, availability and confidentiality of personal data, UVET Group has

implemented an information security management system, a process that covers the following aspects:

- Physical protection measures
- Logical protection measures
- Update and maintenance of security measures
- Security incidents (pursuant to articles 33 and 34 of the GDPR)

UVET Group uses a wide range of technologies (Antivirus, Firewall, TLS encryption protocols, etc.) and procedures (written to document the information security management system) to protect personal data from unauthorized access, use or disclosure.

UVET Group guarantees that the security, technical and organizational measures adopted are

constantly adapted to legislative updates and technical progress.

UVET Group adopts a continuous process of monitoring security measures with the definition of action plans for any necessary interventions.

Prepared in Milan,