

PRIVACY POLICY FOR THE PROCESSING OF USERS' PERSONAL DATA

In accordance with the applicable legislation on personal data protection, European Regulation 2016/679 of the 27th April 2016, "General Data Protection Regulation" (hereinafter, "GDPR") and the Legislative Decree of the 30th June 2003, no. 196 (hereinafter, "Code of Personal Data Protection"), Tripme.com Società a Responsabilità Limitata Semplificata, as identified below, provides its users with all necessary information on the processing of their personal data on the Tripchilkis platform.

1. Data controller and Data Protection Officer

1.1. The data controller is Ttripme.com Società a Responsabilità Limitata Semplificata, based in Brunico / Italy, Via Europa 15, I - 39031, Company Register registration no. 214339, VAT registration number 0289 3310 215, legally represented by Ms. Kathia Gatterer, VAT registration number 0289 3310 215 (hereinafter, "Tripchilkis" or "data controller").

2. Purposes and Legality of the Processing

2.1. Tripchilkis processes users' personal data in order to provide the services requested when signing up on the Tripchilkis website. In particular, the data requested by Tripchilkis at the moment of registration are necessary for the creation of the user account and for browsing the website.

In this case, the user does not need to provide specific consent for the processing of the above mentioned data, since the legal basis for such processing is the performance of the contract to which the data subject is party or the fulfilment of pre-contractual obligations pursuant to art. 6, paragraph 1, lett. b) of the GDPR.

If the user refuses to provide his or her personal data, or asks for them to be deleted, the data controller will not be able to provide the service required, nor to continue providing it.

2.2. Tripchilkis asks users to give their consent for the processing of their personal data with profiling methods, including data regarding their personal preferences and interests shown in their account in relation to journeys or destinations they would like to reach (e.g. by selecting the type or theme of the journey). Users also have the option to give their consent for processing, in accordance with art. 6, paragraph 1, lett. a) of the GDPR, in order to:

- allow the data controller to understand their requirements and needs, with the aim of promoting and organizing services and sending information which more closely correspond to the preferences expressed;
- allow the data controller to create uniform clusters according to the preferences expressed in order to facilitate matching users' requests with the services offered by the platform;
- allow the data controller to compile anonymous statistics on the services which are the most popular with users and the most sought after destinations.

Without specific consent to profiling, the provider will not be able to organize services nor send customised information in line with user preferences. Nevertheless, users will still be able to continue using the services available on the Tripchilkis platform.

2.3. Finally, if users have given their express consent in accordance with art. 6, paragraph 1, lett. a) of the GDPR, Tripchilkis will be able to process their personal data in order to send them commercial communications and carry out marketing activities connected to the platform.

3. Storage of Personal Data

3.1. Tripchilkis will process personal data provided by users in order to use the Tripchilkis platform for the purposes described in paragraph 2.1 only for the time necessary for providing the service required. After the termination of such a service, data will be stored for ten years in accordance with fiscal, accounting and administrative law or for longer periods, which can not be precisely estimated a priori, as a result of specific conditions provided for by the law for the legitimate processing of personal data (e.g. legal actions which might require the data to be processed for more than ten years).

3.2. Tripchilkis will process personal data for profiling purposes described in paragraph 2.2. for one year from the moment consent is given. After such a period of time, the user's personal data regarding preferences expressed and travel interests will be deleted, unless the processing can be legally carried out for further purposes or unless the user has given new consent for the processing.

4. Methods of Processing

4.1. Tripchilkis processes users' personal data in electronic and analogical forms.

4.2. Tripchilkis informs its users that their personal data will not be subject to any decisions based on automated processing which might produce legal effects or which might significantly affect them in accordance with art. 22 of the GDPR.

5. Data Processors and Data Recipients

5.1. Subjects indicated on www.tripchilkis.com in section impressum are designated as data processors according to art. 28 of the GDPR. Therefore, they can process and find out about personal data which users provide.

Please, be aware that Tripchilkis has designated data processors for the following purposes:

- iSYS Software GmbH, Grillparzerstr. 10 | D-81675 München, Hetzner Online GmbH, Industriestr. 25 , D- 91710 Gunzenhausen, which provides Tripchilkis for services of programming of the platform;

- Hetzner Online GmbH, Industriestr. 25 , D- 91710 Gunzenhausen, who acts, on behalf of Tripchilkis, as a server provider for the Tripchilkis platform.

6. Data Subjects' Rights

6.1. Except for limitations to the exercise of data subjects' rights provided for by art 2-undecies and art. 2-duodecies of the Code of Personal Data Protection, users can exercise all rights recognized by the GDPR from art. 15 to art. 21, including the right to access their personal data, the right to rectify or erase them, the right to restrict the processing of their personal data and the right to object to the processing.

6.2. Furthermore, if the conditions provided for by art. 20 of the GDPR are met, users have the right to data portability. The right to data portability is the users' right to receive their personal data, which the data controller processes by electronic means and on the basis of a contract with the users or of their consent, in a structured, commonly used and machine-readable format.

6.3. Additionally, users have the right to lodge a complaint with a Supervisory Authority in accordance with art. 77, paragraph 1 of the GDPR. In Italy, the competent authority is the Garante per la protezione dei dati personali.

6.4. Finally, users have the right to withdraw their consent, when it has been given, to the processing of personal data at any time without affecting the legitimacy of the processing which was based on the consent before its withdrawal.

6.5. Users can exercise the above mentioned rights by mailing a written communication to the data controller's address indicated in paragraph 1 or by sending an e-mail to the following address: info@tripchilkis.com.