

**COOKIE POLICY**  
**EU Regulation 679/2016 General Data Protection Regulation**

Pursuant to article 13 of EU Regulation 679/2016, General Data Protection Regulation (the "**Regulation**"), LS Travel Retail Roma S.r.l. VAT no. 11867061001, Airst Retail S.r.l. VAT no. 04044640276 and Airst Retail BAPA S.r.l. VAT no. 04268990274, as Joint Data Controllers (hereafter: "**Companies**"), hereby provide you with the following information concerning cookies installed on the www.dreamholidaywinner.it website (hereinafter: **Website**).

**1. What cookies are**

Cookies are text files that are sent by a web server (i.e. the computer on which the visited website is "hosted") to the user's browser (Internet Explorer, Firefox, Google Chrome, etc.) and stored on the fixed or mobile device (computer, smartphone or tablet) used for user browsing. Cookies allow the Website to identify the user's device, through the information stored thereon, whenever it is connected to the Website through said device.

Through the use of cookies, we can make it easier for the user to browse on the Website, as well as analyse their preferences and tastes through browsing verification, and consequently offer products and services better matching the interests and expectations of the respective user.

Cookies can be "session" (when they are stored exclusively for the duration of the site browsing session and are deleted upon closing of the browser), or "persistent" cookies (they are stored for a longer time, until their expiration or until deletion by the user). In addition, cookies can be installed by the site that the user is visiting (so-called first-party cookies) or can be installed by other websites (so-called third-party cookies).

Cookies do not collect information directly identifying the user. In fact, the Companies may not use cookies to trace any personally identifiable information (e.g. given name, surname) if not provided directly by the user.

**2. What types of cookies the Companies use**

***Technical navigation or session cookies***

The Companies use technical navigation or session cookies to allow normal and efficient browsing and use of the Website. These cookies allow you, for example, to correctly visualize the pages of the Website or, if you are a registered user, to log in to the restricted areas of the Website.

These cookies do not require obtaining prior, express consent from the user as they are strictly necessary to provide the service requested by the user of the Website.

***Technical functionality cookies***

The Companies use technical functionality cookies that allow you to browse according to the criteria you have selected (for example, the language or products selected by you for purchase) in order to improve the services rendered by the Website. On the Website, based on your express request, these cookies allow you to be recognised when accessing subsequently. Functional cookies are not essential to the functioning of the Website, but improve the browsing quality and experience.

These cookies do not require obtaining prior, express consent from the user as they are strictly necessary to provide the service requested by the user of the Website.

***Third-party analytical cookies***

The Companies use third-party analytical cookies to collect information on the use of the Website by users (number of visitors, pages visited, time spent on the site, etc.) to process statistical analyses, on an aggregated basis, on the number of users and how they browse on our Website.

These cookies will be used only prior consent provided by you. Should you not provide your consent to third-party analytical cookies through the banner, the information related to your use of the Website will not be collected and you will be able to continue your browsing in the Website.

**3. Management of cookie preferences**

Upon accessing any page of the Website, there is a banner containing summary information on the cookies used by the Companies. By providing your authorisation through the banner, you consent to the use of third-party cookies.

Please note that your consent will be required only upon your first access to the Website: subsequently, thanks to the use of a technical cookie, we will store your consent to allow you to access the Website's pages directly on your return (you retain the right to deactivate/activate cookies at any time or delete them: in this case, upon your return, the Website will request your consent again).

#### 4. How to change browser settings concerning cookies

In any case, it is possible to deactivate/activate or delete cookies at any time by using the settings of your web browser. In particular, if you do not wish to receive cookies, you may set your browser to alert you of the existence of a cookie so you can decide whether to accept it or not; you can also automatically refuse all cookies by activating the appropriate option in the browser. It is also possible to delete specific cookies that have already been stored in the browser, block the storage of cookies on your computer by specific websites and block third-party cookies.

The following are the procedures offered by the main browsers:

- **Internet Explorer** (<http://windows.microsoft.com/it-it/windows7/how-to-manage-cookie-in-internet-explorer-9>)
- **Chrome** ([https://support.google.com/chrome/answer/95647?hl=it\\_ser](https://support.google.com/chrome/answer/95647?hl=it_ser))
- **Firefox** (<https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>)
- **Opera** (<http://help.opera.com/Windows/10.00/it/cookie.html>)
- **Safari** (<https://support.apple.com/it-it/HT201265>)

After the deactivation of all cookies, including technical cookies, some functions of the web pages may not be performed correctly.

You can also manage your cookie preferences at <http://www.youronlinechoices.com>.

#### 5. Who processes your data

The data collected using cookies may be processed by employees and collaborators of the Companies, as authorised data processors. Such data may also be processed by trusted companies that perform tasks of a technical and organisational nature on our behalf. These companies are our direct collaborators and hold the role of external data processors.

In particular, as part of data processing carried out through the Website, the Companies have appointed LIMEO INTERACTIVE, with registered office in France, as the data processor with regard to management and technical maintenance of the Website.

Data collected using cookies will not be disclosed.

#### 6. Transfer of your data outside the European Union

The data collected using Google cookies will be transferred outside the European Union (United States).

The applicable privacy legislation establishes that your specific consent is not necessary to transfer to non-EU countries when the transfer of your data is necessary for the performance of a contract between the data subject and the data controller (art. 49, paragraph 1), letter (b) of the Regulation), or upon the performance of pre-contractual measures adopted at the request of the data subject; it is carried out to a country that guarantees an adequate level of protection (art. 45 of the Regulation) or based on the adoption of adequate guarantees (articles 46 and 47 of the Regulation), and in particular based on the adoption of binding rules for groups of companies, the adoption of contractual clauses approved by the European Commission or adherence to the guarantees established in the Privacy Shield agreement with the USA.

The transfer of your data to third countries will therefore take place in compliance with the guarantees, measures and rights established by the Privacy Shield Agreement for the United States.

By simple request to be made to the details indicated in point 9) you may receive more information on the transfer of your data and on the guarantees established for their protection as well as on the means to obtain such data or the place where they were made available.

#### 7. What your rights are

By means of a communication to be sent to the addresses indicated below in point 9), you may at any time exercise the rights referred to in arts. 15 to 22 of the Regulation, including:

- obtaining confirmation whether or not personal data concerning you is being processed;
- obtaining access to your personal data and to the information indicated in art. 15 of the Regulation;
- obtaining the correction of inaccurate personal data concerning you without unjustified delay or the amendment of incomplete personal data;
- obtaining the deletion of personal data concerning you without undue delay;
- obtaining a limitation on the processing of personal data concerning you;
- being informed of any corrections, deletions or limitations on the processing carried out in relation to personal data concerning you;
- receiving personal data concerning you in a structured, commonly used and automatically readable format from an automatic device;
- objecting at any time, for reasons connected with your particular situation, to the processing of personal data concerning you.

In particular, you retain the right to withdraw at any time any consent provided to processing and to object to our analysis activities.

Furthermore, pursuant to art. 21 of the Regulation, you have the right to object at any time, for reasons connected with your particular situation, to the processing of personal data concerning you for the pursuit of the legitimate interests of the Data Controller pursuant to art. 6, paragraph 1, letter f of the Regulation.

#### **8. Who you can contact to submit a complaint**

We remind you that, if you believe that processing concerning you violates the provisions of the Regulation, you may always submit a complaint to the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or, otherwise, to the Data Protection Authority of the country in which you reside habitually, work or, lastly, of the place where the alleged violation occurred.

#### **9. Joint Data Controllers and Data Protection Officer**

The Joint Data Controllers are the Companies, LS Travel Retail Roma S.r.l., Airst Retail S.r.l. and Airst Retail BAPA S.r.l., with registered office in Gaggio di Marcon (VE) 30020, Via Fratelli Bandiera no. 7; tel. 041/4561111, e-mail [privacy@lagardere-tr.it](mailto:privacy@lagardere-tr.it).

The Data Protection Officer designated pursuant to art. 37 of the Regulations by the Company may be contacted at the e-mail address: [dpo@lagardere-tr.it](mailto:dpo@lagardere-tr.it).

For more information about the processing of your data through the Website, please visit the Privacy Policy available on the Website.