

**PRIVACY POLICY
DREAM HOLIDAY CONTEST**

Art. 13 of the EU-Regulation no. 2016/679 on the lawful processing of personal data.

a) Who is responsible for processing your data

Your data shall be processed by LS TRAVEL RETAIL ROMA SRL, VAT no 11867061001, AIREST RETAIL SRL, VAT no 04044640276 and AIREST RETAIL BAPA SRL, VAT no 04268990274 (hereinafter the "**Joint Controllers**"). They have their registered offices in Gaggio di Marcon (VE), via Fratelli Bandiera n.7 and shall jointly collect and process your personal data in accordance with Art. 13 of the EU-Regulation no. 679/2016 General Data Protection Regulation (GDPR).

b) What are the reasons for processing;

We shall process your personal data in accordance with the above-mentioned Regulation and strictly for the following purposes:

- (1) Allowing your entry to the "Dream Holiday" contest;
- (2) Reply to your requests for information and contact made through the contact@dreamholidaywinner.it email address;
- (3) Fulfilling the statutory obligations applicable to the "Dream Holiday" contest.

The reasons specified by the law for processing the personal data is the execution of the above mentioned (contest) contract and the performance of the related legal obligations.

- (4) Sending (by ways of newsletters, e-mails, texts) advertisement/ promotional materials.

The grounds for processing is your consent, which can also be denied. Your refuse to consent will not stop you from joining the contest anyway. You are free to withdraw your consent at any time.

c) What data we collect:

The data marked by (*) are mandatory to enter the "Dream Holiday" contest.

In order to reply to your requests for information and contact made through the contact@dreamholidaywinner.it email address, the Companies may process, even through entities appointed as data processor, the following categories of data: contact details, personal information and any other information you may provide through the emails sent to contact@dreamholidaywinner.it.

b) How we process your data:

We will process your data in paper and electronic formats in accordance with applicable rules and regulations taking all possible measures to ensure their safety, and confidentiality, preventing their disclosure and non-authorized use, modifications and destruction.

If you consent, we shall use your data for publicity and promotional purposes. We shall process your data to inform you of special sales, and/or discounts, or marketing communications (i.e. Shopping terms) and actions (i.e. Contests).

e) How long we keep your data:

Your personal data shall be kept throughout the length of the "Dream Holiday" Contest, and after the end of the contest as long as needed to comply with the applicable statutory obligations. By releasing your consent, you allow us to use your data to inform you on our marketing actions, without prejudice to your right of withdrawing your consent. In this case, your data will be cancelled or anonymized.

f) Whom we disclose your data:

Your data will not be disclosed. In order for you to join the "Dream Holiday" contest, and provided that you agreed to receiving marketing and advertising communications, we may disclose your data to the authorized persons responsible for data processing at the Sales, Marketing & Development department of the Companies.

Moreover, we may share your data with the following entities appointed as Data Processors:

- i. company delegated according to DPR no. 430/2001 in the framework of this contest;
- ii. companies that manage the organization and performance of this contest;
- iii. companies that manage the preparation and sent of marketing communication;
- iv. companies that manage the creation and sent of newsletter containing advertising and promotional material;
- v. companies in charge of the information systems management (website and databases);
- vi. officials and notary public (authorized to the extraction of winners and reserves).

The names of all external processors may be obtained by means of a written request to privacy@lagardere-tr.it.

Moreover, we may disclose your data to the Italian Ministry of Economic Development and other Public administrations or Authorities if needed for the management of the event/contest.

g) We are not disclosing your data to anyone outside the European Union:

We do not transfer nor disclose your personal data to anyone in any other country that is not a member of the European Union.

h) What are your rights:

You may write to privacy@lagardere-tr.it, indicating as subject “Dream Holiday Contest – Exercise of data protection rights” and exercise your rights as per Art. 15-22 of the GDPR at any time. This includes your right to access your personal data; change, cancel, or limit them; request to receive, or transfer your data to another controller in an organized format that you can read on any common hardware, with common software. Moreover, you may oppose the processing of your data, in particular for marketing purposes. If you wish, you may restrict your consent to marketing communications.

i) How to raise a claim:

If you feel that the processing of your personal data is performed in violation of any of the provisions of the GDPR, you may raise your claim at the Data Protection Authority (www.garanteprivacy.it) in Italy, or in your country of residence, work, or alleged violation.

k) How to contact the Data Protection Officer:

The data protection officer is available at the following email address: dpo@lagardere-tr.it.

LS TRAVEL RETAIL ROMA SRL
AIREST RETAIL SRL
AIREST RETAIL BAPA SRL