

## **THE MAPTIQUE SERVICES PRIVACY NOTICE**

The Maptique srl is committed to maintaining the privacy and security of your personal data. This Privacy Notice explains how we collect and process your personal data through your use of this website, including any data you may provide through this website and when you sign up to our newsletter. It is important that you read this Privacy Notice so that you are aware of how and why we are using your personal data. This website is not intended for children and we do not knowingly collect data relating to children (under 18). This privacy policy supplements other notices and privacy policies and is not intended to override them.

## **WHO WE ARE**

The Maptique srl is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. Where we act as a data controller, we are required under data protection legislation to notify anyone who provides personal data to us, either directly or through a third party, of the information contained in this Privacy Notice. The Maptique srl (company number C.F. e P.IVA 10420440967) is registered at via Curtatone 17, 20122 Milan. When we mention "The Maptique Srl", "we", "us" or "our" in this Privacy Notice, we are referring to this company, which is responsible for processing your data.

## **DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## **CONTACT DETAILS**

- Name of DPO: Agnese Violati / Paola Mapelli
- Email address: Agnese@madmap.it / paola@madmap.it
- Postal address: via Curtatone 17, 20122 Milan, Italy

You have the right to make a complaint at any time to the Garante della Privacy, the Italian supervisory authority for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the Garante so please contact us in the first instance.

## **WHAT IS PERSONAL DATA?**

Personal data is any information about an individual from which that individual can be identified. Your name, address, phone number and bank account number are examples of personal data. It does not include data where the identity has been removed (anonymous data).

## **DATA PROTECTION PRINCIPLES**

In compliance with data protection law, the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.

- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a **contract** we have entered into with you.
- Where we need to comply with a **legal obligation**.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be less common:

- Where we need to protect your **vital interests** (or someone else's interests).
- Where it is needed in the **public interest** (for example, equal opportunities monitoring) or for official purposes.

Generally, we do not rely on **consent** as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us.

## CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## THE PERSONAL DATA WE COLLECT ABOUT YOU

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data:** such as your name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data:** your billing address, delivery address, email address and telephone numbers.
- **Technical Data:** internet protocol (IP) address, your login data (if applicable), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

- **Profile Data:** your username and password (if applicable), purchases made by you, your interests, preferences, feedback and survey responses.
- **Usage Data:** information about how you use our website and services.
- **Marketing and Communications Data:** your preferences in receiving marketing from us and our third parties and your communication preferences.

We also may collect, use and share Aggregated Data, which could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

## ENQUIRIES

When you request information or make enquiries about any of our services or programmes, we may use the personal data you provide in order to fulfil your request or respond to your enquiry. It is in our legitimate interests to use your personal data in this way so that you receive the information you have requested.

## BOOKINGS

If you submit a booking request or purchase any of our other services, we may collect the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth and gender;
- Nationality and country of residence;
- Bank account details and billing address;
- Credit card or other payment information in order to process your payments.

This information will be used by us to perform the contract we have entered into with you.

We do not collect such Special Categories of Personal Data about you as your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

## MARKETING

Where you have explicitly consented to do so, we may use your personal data to inform you of special offers and new or existing services that we believe may be of interest to you. If you would prefer that we do not send such communications to you, please follow the opt-out links on any marketing message or contact us using the contact details in this Privacy Notice.

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| <b>THIRD-PARTY MARKETING</b>                | We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.  |
| <b>INTERNAL BUSINESS PURPOSES</b>           | We also may use your personal data for our internal business purposes. This is in our legitimate interests in order to operate as a business and monitor and improve the services we provide. Where possible we will anonymise this information. Please contact us using the contact details in this Privacy Notice if you would like more information.  |
| <b>HOW IS YOUR PERSONAL DATA COLLECTED?</b> | <p>We use different methods to collect data from and about you including through:</p> <ul style="list-style-type: none"> <li>• <b>Direct interactions.</b> You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: <ul style="list-style-type: none"> <li>• apply for our services;</li> <li>• create an account on our website;</li> <li>• subscribe to our service or publications;</li> <li>• request marketing to be sent to you;</li> <li>• give us feedback or contact us.</li> </ul> </li> <li>• <b>Automated technologies or interactions.</b> As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.</li> <li>• <b>Third parties or publicly available sources.</b> We may receive personal data about you from various third parties and public sources such as analytics providers, advertising networks, search information providers etc.</li> </ul> |
| <b>IF YOU FAIL TO PROVIDE PERSONAL DATA</b> | Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with certain services you requested). In this case, we may have to cancel a service you have with us but we will notify you if this is the case at the time.  |
| <b>OPTING OUT</b>                           | <p>You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.</p> <p>Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase or other transactions entered with you other pursuant to the service supplied.</p>   |
| <b>CHANGE OF PURPOSE</b>                    | We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.   |

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### WHEN AND HOW WE SHARE YOUR PERSONAL DATA WITH OTHERS

We may share your personal data with third parties where required by law, where it is required to perform a contract or where we have a legitimate interest in doing so. Such third parties may include but not limited to the following:

- **Our service providers:** We may share your personal data with other companies that perform certain services on our behalf. These services may include processing payments, providing customer service and marketing assistance, performing business and sales analysis and supporting our website and IT functionality. These service providers may be supplied with or have access to your personal data solely for the purpose of providing these services to us or on our behalf. The Maptique srl is the data controller and will remain accountable for your personal data.
- **Third parties** to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

#### INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the European Economic Area (**EEA**).

#### THE SECURITY OF YOUR PERSONAL DATA

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: *see your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please contact us using the contact details in this Privacy Notice if you would like more information.

## YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data, such as:

- **Request access** to your personal data (commonly known as a “data subject access request”).  
This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal that we hold about you.  
This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us using the contact details in this Privacy Notice.

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| <b>YOUR RIGHT TO WITHDRAW CONSENT</b> | In circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for specific purpose, you have the right to withdraw your consent for that specific processing at any time. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent. To withdraw your consent, please contact us using the contact details in this Privacy Notice. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. |
| <b>NO FEE USUALLY REQUIRED</b>        | You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.  |
| <b>WHAT WE MAY NEED FROM YOU</b>      | We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.  |
| <b>TIME LIMIT TO RESPOND</b>          | We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.   |
| <b>CHANGES TO THIS PRIVACY NOTICE</b> | This policy is written in compliance with the Italian <i>decreto legislativo n.101</i> issued on the 10th of August 2018 ("decreto gdpr"). We reserve the right to update this Privacy Notice at any time.   |