

PRIVACY POLICY

Data Controller: for the purposes of this notice, Data Controller means: Be Safe Group S.r.l., with registered office in 20122 Milan (MI), Via Pattari 6, C.F./P.I. 14562641002, email: besafegroupsrl@legalmail.it.

Pursuant to and for the purposes of Article 13 of Regulation (EU) No. 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of Personal Data and on the free movement of such Data (the '**Regulations**' or the '**GDPR**') and Legislative Decree No. 196 of 30 June 2003, no. 196 'Personal Data Protection Code' ('**Code**') (Code and Regulations also jointly defined as '**Legislation**') we inform data subjects ('**Data Subjects**') that their Personal Data will be processed in accordance with the Legislation in force and as specified below.

Definitions

- **Authorised** persons means natural persons authorised to carry out Processing operations under the direct authority of the Data Controller or Data Processor, pursuant to Article 29 of the Regulation and Article 2-quaterdecies of the Code.
- **Communication** means giving knowledge of the Personal Data to one or more specified parties other than the Data Subject, the Data Controller's representative in the territory of the State, the Data Processor and the Authorised Persons, in any form whatsoever, including by making them available or consulting them.
- **Designated** persons, the natural persons to whom specific tasks and functions related to the processing of Personal Data are attributed and who operate under the authority of the Data Controller or Data Processor, pursuant to Article 2-quaterdecies of the Code.
- **Personal data or Data** shall mean any information relating to a natural person who is identified or identifiable, even indirectly, by reference to any other information, in particular an identifier such as a name, an identification number, location data, an online identifier or one or more characteristic elements of his physical, physiological, genetic, mental, economic, cultural or social identity.
- **Dissemination** means making Personal Data known to unspecified persons, in any form whatsoever, including by making them available or consulting them.
- **Guarantor**, the supervisory authority referred to in Article 51 of the Regulation.
- **Information or Privacy Policy**, this document.
- **Data subject** means the natural person to whom the Personal Data refer.
- **Security Measures** means the set of technical, IT, organisational, logistical and procedural measures adopted by the Data Controller to ensure a level of security appropriate to the risk of Processing, pursuant to Article 32 of the Regulation.
- **Controller** means the natural or legal person, public authority, service or other body that processes Personal Data on behalf of the Data Controller.
- **Controller** shall mean the natural or legal person, public authority, agency or other body which alone or jointly with others determines the purposes and means of the Processing of Personal Data; where the purposes and means of such Processing are determined by Union or Member State law, the Controller or the specific criteria applicable to its designation may be established by Union or Member State law.

· **Processing** means any operation or set of operations which is performed upon Personal Data or sets of Personal Data, whether or not by automatic means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Information on the Processing of Personal Data

1. Context of Processing

This Information Notice is provided by the Data Controller in relation to the following context: Activation and management of policies that travellers choose during the process of booking their trips via online channels (e.g. hotel websites) and/or offline channels (travel agencies). These policies cover events such as trip cancellation and/or physical damage. In particular, these are inclusion policies taken out between BE SAFE GROUP and insurance companies, in which travellers are named as beneficiaries.

2. Processing performed

Below we set out, in analytical form, the Data collected, the purposes for which they are processed, the legal bases and the retention periods.

Processed data	Purpose	Legal basis	Storage time
<ul style="list-style-type: none"> · Name · Soyadı · email · Payment data · booking code · booking status · Data concerning the stay · Guest data 	This is done in order to activate insurance cover for the traveller and his guests.	The Processing is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at his or her request [Art. 6 lett. b) GDPR]	Personal Data are pseudonymised one year after completion of the stay if no claims have occurred, otherwise the Data are retained until the expiry of the statutory limitation period
<ul style="list-style-type: none"> · Name · Soyadı · email · PIN code 	Processing is carried out in order to create a user account for the traveller benefiting from BeSafeRate protection and to send him/her a communication by e-mail containing instructions on how to access the reserved area.	The Processing is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at his or her request [Art. 6 lett. b) GDPR]	Personal Data are pseudonymised one year after completion of the stay if no claims have occurred, otherwise the Data are retained until the expiry of the statutory limitation period
<ul style="list-style-type: none"> · email · session cookie · PIN code 	The Processing is carried out for the purpose of enabling the user authenticated on the Controller's platform to access information relating to trips for which BeSafeRate coverage is active and to use the further functionalities of the Dashboard.	The Processing is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at his or her request [Art. 6 lett. b) GDPR]	Personal Data are pseudonymised one year after the completion of the stay if no claims have occurred, otherwise the Data are retained until the expiry of the period prescribed by law
name	Processing is carried out at	Processing is necessary	Personal Data is

<ul style="list-style-type: none"> · surname · email · booking code · Various data relating to the claim 	<p>purpose of opening a claim file, through the insurance broker, with the insurance company issuing the inclusion policy in the name of the Be Safe Group, relating exclusively to the cancellation of the trip, of which the Interested Party is the beneficiary.</p>	<p>the performance of a contract to which the data subject is party or the performance of pre-contractual measures taken at his request [Art. 6 lett. b) GDPR]</p>	<p>pseudonymised one year after completion of the stay if no claims have been made, otherwise the Data are retained until the expiry of the statutory period of limitation</p>
<ul style="list-style-type: none"> · IP address · Navigation data 	<p>Managing HTTP requests from the BE SAFE Platform.</p>	<p>The Processing is necessary for the performance of a contract to which the Data Subject is party or for the performance of pre-contractual measures taken at his or her request [Art. 6 lett. b) GDPR]</p>	<p>Browsing Data are deleted within 30 days of collection, without prejudice to any need for investigation of criminal offences by the judicial authorities.</p>
<ul style="list-style-type: none"> · Booking data (booking code, identification data of the person making the reservation and any guests, travel information, etc.) · Contact details · Identifying data 	<p>Processing is carried out for the purpose of pseudonymising Personal Data.</p>	<p>Processing is necessary for the pursuit of the legitimate interests of the data controller or a third party [Art. 6(f) GDPR].</p>	<p>10 years (expiry of the statutory limitation period)</p>

3. Methods of Processing and Categories of Recipients.

1. Unless expressly provided otherwise in this Information Notice, the Data Subject is hereby informed that his or her Personal Data is processed by means of manual and/or computerised, telematic or otherwise automated systems, in compliance with the principles of relevance, lawfulness, correctness and purpose provided for in the Regulations.
2. The Data Controller processes the Personal Data of the Data Subject by adopting appropriate Security Measures aimed at minimising the risks of unauthorised access, dissemination, loss and destruction of such Data, in accordance with the Regulations.
3. The Data Subject is also informed that the Processing of Personal Data for the fulfilment of the aforesaid purposes may be carried out by the Data Controller directly or through the cooperation of other entities, in their capacity as Data Processors, Designated or Authorised Persons (e.g. the Data Controller's employees and/or collaborators).
4. In particular, Personal Data may be disclosed to the following categories of recipients (Autonomous Controllers):
 - insurance companies
5. The Data Subject is hereby informed that Personal Data may be disclosed to the following categories of external Data Processors:
 - Cloud Service Providers (AWS)
6. The complete and up-to-date list of Persons in charge may be consulted at any time by making a request to the e-mail address indicated at the beginning of this Policy.

4. Data transfer

1. The Data Subject is informed that the Personal Data processed by the Data Controller may be transferred to other countries within the European Union.

2. The Data Subject is informed that the Personal Data processed by the Data Controller may be transferred to other countries outside the European Union, for which there is an adequacy decision by the Commission or for which additional security measures are applied following an assessment by the Data Controller of the impact of the transfer on the rights and freedoms of the Data Subject.

5. Rights of the Data Subject

1. The Interested Party may at any time, by means of a communication to be sent to the addresses indicated at the beginning of this Information Notice, exercise the rights provided for in the Regulation pursuant to Articles 15-22. In particular:
 - The Data Subject has the right to ask the Data Controller for access to Personal Data, pursuant to and within the limits of Article 15 of the Regulation.
 - The Data Subject has the right to request the Data Controller to rectify inaccurate Personal Data, pursuant to and within the limits of Article 16 of the Regulation.
 - The Data Subject has the right to request the Data Controller to delete Personal Data, pursuant to and within the limits of Article 17 of the Regulation.
 - The Data Subject has the right to request the Data Controller to restrict the Processing of Personal Data, pursuant to and within the limits of Article 18 of the Regulation.
 - The Data Subject has the right to request from the Data Controller the communication of his or her Personal Data in a structured and machine-readable format, pursuant to and within the limits of Article 20 of the Regulation.
 - The Data Subject has the right to object to the Processing by the Data Controller, pursuant to and within the limits of Article 21 of the Regulation.
 - The data subject has the right to lodge a complaint with a supervisory authority.
 - **The data subject has the right to withdraw consent with regard to those Processing operations that are based on that legal basis.** Pursuant to Art. 7(3) and Art. 13(2)(c) of the Regulation, the Data Subject is hereby informed that, in any event, withdrawal of consent shall not affect the lawfulness of the Processing based on consent prior to such withdrawal.

6. Changes to this Privacy Policy

1. The Data Controller reserves the right to make changes to this Privacy Policy at any time, giving notice thereof to Data Subjects by publication on the Site.

This Policy was published on 11 March 2025