



INFORMATION ON THE PROCESSING OF PERSONAL DATA REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 27 APRIL 2016

Pursuant to and for the purposes of Article 13 and Article 14 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 (General Data Protection Regulation, hereinafter also referred to as "Regulation" or "GDPR") and repealing Directive 95/46/EC, we inform you that the personal data you voluntarily make available to the company SpiritualTour srl also through the www.spiritualtour.it, will be processed in compliance with current legislation on the protection of personal data and, in any case, with the principles of confidentiality that inspire the company's activities.

I - INFORMATION RELATING TO THE PRIVACY POLICY OF THE SITE

1. This section contains information regarding the management methods of the company SpiritualTour srl with reference to the processing of data of users of www.spiritualtour.it.

2. This information is also valid for the purposes of 'art. 13 of Legislative Decree no. 196/2003, Code for the protection of personal data, and for the purposes of Article 13 of EU Regulation no. 2016/679, concerning the protection of individuals with regard to the processing of personal data and the free movement of such data, for those who interact with www.spiritualtour.it and can be reached at the address corresponding to the home page:
https://www.spiritualtour.it/pdf/privacy_eng.pdf.

3. The information is provided only for www.spiritualtour.it and not for other websites that may be consulted by the user through links contained therein.



4. The purpose of this document is to provide information on the methods, timing and nature of the information that data controllers must provide to users when connecting to the web pages of www.spiritualtour.it, regardless of the purpose of the connection itself, according to Italian and European legislation.

5. The information may be subject to changes due to the introduction of new regulations in this regard, we therefore invite the user to check this page periodically.

6. If the user is under 16 years of age, according to art.8, c.1 EU regulation 2016/679, he or she will have to legitimize his or her consent through the authorization of his or her parents or guardian.

II - DATA PROCESSING

II-1 - Data Controller

1. The controller is the natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data. It shall also deal with security profiles. 2. With regard to this website, the data controller is the pro tempore legal representative of the company and for any clarification or exercise of the user's rights, the user may contact him/her at the following email address: info@spiritualtour.it.

II-2 - Data processor

1. The controller is the natural or legal person, public authority, department or other body which processes personal data on behalf of the controller. 2. In accordance with Article 28 of Regulation (EU) No 2016/679, upon appointment of the data controller, the data controller of www.spiritualtour.it is Neven Adzaip.



II-3 - Place of data processing

1. The processing of data generated by the use of www.spiritualtour.it takes place at Via Tamagno 6, Varese 2110, or at the company headquarters.
2. In case of necessity, the data connected to the newsletter service may be processed by the data controller or persons appointed by him/her for this purpose at the relevant offices.

III - COOKIES

III-1 - Type of Cookies

1. The www.spiritualtour.it website uses cookies to make the user's browsing experience easier and more intuitive: cookies are small strings of text used to store certain information that may concern the user, his/her preferences or the Internet access device (computer, tablet or mobile phone) and are mainly used to adapt the operation of the site to the user's expectations, offering a more personalized browsing experience and storing the choices made previously.
2. A cookie consists of a small set of data transferred to the user's browser from a web server and can only be read by the server that made the transfer. It is not executable and does not transmit viruses.
3. Cookies do not record any personal information and any identifiable data will not be stored. If you wish, you can prevent some or all cookies from being saved. However, in this case your use of the website and the services offered may be affected. To proceed without changing the options for cookies, simply continue browsing. Below are the types of cookies that the site uses:



III-2 - Technical Cookies

1. There are numerous technologies used to store information on your computer, which is then collected by the sites. Among these, the best known and most widely used is HTML cookies. They are used for navigation and to facilitate access and use of the site by the user. They are necessary for the transmission of communications over an electronic network or to the provider to provide the service requested by the customer.

2. The settings to manage or disable cookies may vary depending on the internet browser used. However, the user can manage or request the general deactivation or deletion of cookies by changing the settings of your internet browser. Such deactivation may slow down or prevent access to certain parts of the site.

3. The use of technical cookies allows the safe and efficient use of the site. 4. The cookies that are inserted in the browser and retransmitted through Google Analytics or through the statistical service of bloggers or similar are technical only if used for site optimization purposes directly by the site owner, who can collect information in aggregate form on the number of users and how they visit the site. Under these conditions, for analytics cookies, the same rules on information and consent apply as for technical cookies. 5. From the point of view of duration, it is possible to distinguish temporary session cookies that are automatically deleted at the end of the browsing session and are used to identify the user and therefore avoid the login to each page visited and permanent cookies that remain active in the PC until expiry or cancellation by the user. 6. Session cookies may be installed in order to allow access and stay in the reserved area of the portal as an authenticated user. 7. They are not stored permanently but only for the duration of navigation until the browser is closed and disappear when the browser is closed. Their use is strictly limited to the transmission of session identifiers consisting of random numbers generated by the server necessary to allow the safe and efficient exploration of the site.



III-3 - Third Party Cookies

1. We distinguish between cookies sent to your browser directly from the site you are visiting and third-party cookies sent to your computer from other sites and not from the one you are visiting. 2. Permanent cookies are often third party cookies. 3. Most third party cookies are tracking cookies used to identify online behavior, understand your interests and then customize advertising proposals for you. 4. Analytical third party cookies may be installed. They are sent by third party domains outside the site. 5. Third party analytics cookies are used to detect information about user behavior on www.spiritualtour.it. The detection takes place anonymously, in order to monitor performance and improve the usability of the site. Third party profiling cookies are used to create profiles related to users, in order to propose advertising messages in line with the choices made by users. 6. The use of these cookies is governed by the rules prepared by the third parties themselves, therefore, users are invited to read the privacy policy and the instructions to manage or disable the cookies published on the relevant web pages.

III-4 - Profiling Cookies

1. Profiling cookies are those that create profiles related to the user and are used to send advertising messages in line with the preferences expressed by the user when surfing the web. 2. When these types of cookies are used, the user must give explicit consent.

3. Article 22 of EU Regulation 2016/679 and Article 122 of the Data Protection Code shall apply.



IV - PROCESSED DATA

IV-1 - Data processing mode

1. Like all websites, this website also makes use of log files in which information collected automatically during users' visits is stored. The information collected may include the following: - internet protocol (IP) address;

- browser type and device parameters used to connect to the site; - name of the internet service provider (ISP); - date and time of visit; - visitor's referral and exit web page;

- the number of clicks, if any. 2. The above information is processed in an automated form and collected exclusively in aggregated form in order to verify the correct functioning of the site, and for security reasons. This information will be processed according to the legitimate interests of the owner. 3. For security purposes (spam filters, firewalls, virus detection), the automatically recorded data may also include personal data such as the IP address, which could be used, in accordance with the laws in force, to block attempts to damage the site itself or to cause damage to other users, or in any case harmful or criminal activities. Such data are never used for the identification or profiling of the user, but only for the protection of the site and its users, such information will be treated according to the legitimate interests of the owner. 4. If the site allows the insertion of comments, or in the case of specific services requested by the user, including the possibility of sending the Curriculum Vitae for a possible employment relationship, the site automatically detects and records some identification data of the user, including the email address. Such data are considered voluntarily provided by the user at the time of the request for the provision of the service. By entering a comment or other information the user expressly accepts the privacy policy, and in particular agrees that the contents entered are also freely distributed to third parties.



The data received will be used exclusively for the provision of the requested service and only for the time necessary to provide the service. 5. The information that users of the site will consider to make public through the services and tools made available to them, are provided by the user knowingly and voluntarily, exempting this site from any liability for any violations of the law. It is the user's responsibility to verify that he or she has permission to enter personal data of third parties or content protected by national and international regulations.

IV-2 - Purposes of data processing

1. The data collected by the site during its operation are used for the purposes indicated above. 2. The data will be stored for the period strictly necessary to achieve the above mentioned purpose and in any case not exceeding 5 years. 3. The data used for security purposes (blocking attempts to damage the site) are kept for the time strictly necessary to achieve the purpose previously indicated.

IV-3 - Data provided by the user

1. As indicated above, the optional, explicit and voluntary sending of electronic mail to the addresses indicated on this site involves the subsequent acquisition of the sender's address, necessary to respond to requests, as well as any other personal data included in the message. 2. Specific summary information will be progressively reported or displayed on the pages of the site prepared for particular services on request.

IV-4 - Support in the configuration of your browser

1. You can also manage cookies through your browser settings. However, deleting cookies from your browser may remove the preferences you have set for the site. 2. For more information and support you can also visit the specific help page of the web browser you are using:



- Internet Explorer: <http://windows.microsoft.com/en-us/windows-vista/block-or-allow-cookies>
- Firefox: <https://support.mozilla.org/en-us/kb/enable-and-disable-cookies-website-preferences>
- Safari: <http://www.apple.com/legal/privacy/it/>
- Chrome: <https://support.google.com/accounts/answer/61416?hl=it>
- Opera: <http://www.opera.com/help/tutorials/security/cookies/>

IV-5 - Plugin Social Network

1. This site also incorporates plugins and/or buttons for social networks in order to allow easy sharing of content on your favorite social networks. These plugins are programmed so that no cookies are set when you access the page, in order to safeguard your privacy. Cookies are only set, if so provided by social networks, when the user makes effective and voluntary use of the plugin. Please note that if you are logged into the social network, you have already consented to the use of cookies transmitted through this site when you subscribe to the social network.

2. The collection and use of information obtained through the plugin is governed by the respective privacy policies of social networks, to which please refer:

Facebook: <https://www.facebook.com/help/cookies>

Twitter: <https://support.twitter.com/articles/20170519-uso-dei-cookie-e-di-altre-tecnologie-simili-da-parte-di-twitter>

Google+: <http://www.google.com/policies/technologies/cookies>

Pinterest: <https://about.pinterest.com/it/privacy-policy>

AddThis: <http://www.addthis.com/privacy/privacy-policy>



Linkedin: <https://www.linkedin.com/legal/cookie-policy>

V - USER RIGHTS

1. Article 13, paragraph 2 of EU Regulation 2016/679 lists the user's rights. 2. The site www.spiritualtour.it therefore intends to inform the user of the existence of: - the right of the data subject to request access to personal data from the owner (art. 15 EU Regulation), their updating (art. 7, para. 3, letter a) D.Lgs. 196/2003), rectification (art. 16 EU Regulation), integration (art. 7, para. 3, letter a) D.Lgs. 196/2003) or limitation of the treatment that concerns him/her (art. 18 EU Regulation) or to oppose, for legitimate reasons, their processing (art. 21 EU Regulation), in addition to the right to portability of data (art. 20 EU Regulation); - the right to request cancellation (art. 17 EU Regulation), transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed (art. the right to obtain certification that the operations of updating, rectification, integration of data, cancellation, blocking of data, transformation have been notified, also as regards their contents, to those to whom the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate to the protected right (art. 7, paragraph 3, letter C) of Legislative Decree 196/2003); 3. Requests may be addressed to the data controller, without formalities or, alternatively, using the model provided by the Guarantor for the Protection of Personal Data, or by sending an email to: info@spiritualtour.it.



4. Where the processing is based on Article 6(1)(a) - express consent to the use - or on Article 9(2)(a) - express consent to the use of genetic, biometric, health-related data revealing religious or philosophical beliefs or trade-union membership, revealing racial or ethnic origin, political opinions - the user has the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before the withdrawal. 5. Similarly, in case of violation of the law, the user has the right to lodge a complaint with the Guarantor for the Protection of Personal Data, as the authority responsible for monitoring the processing in the Italian State. 6. For a more detailed examination of your rights, see articles 15 and following articles of EU Regulation 2016/679 and art. 7 of Legislative Decree 196/2003.

VI - TRANSFER OF DATA TO COUNTRIES OUTSIDE THE EU

1. This site may share some of the data collected with services located outside the European Union. In particular with Google, Facebook and Microsoft (LinkedIn) via social plugins and the Google Analytics service. The transfer is authorized and strictly regulated by Article 45, paragraph 1 of EU Regulation 2016/679, so no further consent is required. The above mentioned companies guarantee their adherence to the Privacy Shield.

2. Data will never be transferred to third countries that do not comply with the conditions set out in Article 45 et seq. of EU Regulation 2016/679.

VII - DATA SECURITY PROVIDED

1. This site processes user data in a lawful and correct manner, taking appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of data. The processing is carried out using computerized and/or telematic tools, with organizational methods and logics strictly related to the purposes indicated.



2. In addition to the owner, in some cases, categories of persons involved in the organization of the site (administrative, commercial, marketing, legal, system administrators) or external parties (such as third party technical service providers, postal carriers, hosting providers, computer companies, communication agencies) may have access to the data.

VIII - AMENDMENTS TO THIS DOCUMENT

1. This document, published at <https://www.spiritualtour.it/pdf/privacy.pdf> constitutes the privacy policy of this site. 2. It may be subject to changes or updates. In the event of relevant changes and updates, users will be notified of such changes and updates by means of appropriate notices. 3. The document was updated on 24/05/2018 to comply with the relevant regulatory provisions, and in particular in accordance with EU Regulation 2016/679.