

LEGAL PRACTICE

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Privacy & Cookie Policy Bus Travel Service

Privacy policy pursuant to Art. 13 GDPR (EU Reg. 2016/679) et seq.

Introduction

The privacy and security of your personal data is and always will be one of our top priorities. We therefore want to explain to you in a transparent manner how and why we collect, store, share and use your personal data, as well as the controls and choices you can exercise over when and how we share your personal data.

This is our goal, and in this Privacy Policy ('Policy') we explain in detail what we mean by this.

You may be aware that the new European Union regulation, called the General Data Protection Regulation or 'GDPR', confers certain rights on natural persons in relation to their personal data, implementing the rules of the old Privacy Code in the light of new technological developments.

Rights of the data subject

The rights that European legislation provides for users are:

- Right of access: the right to be informed and to request access to processed personal data concerning you (commonly known as 'data subject access request');

- Right of rectification: the right to request that the user's personal data be amended or updated in the event of inaccuracy or incompleteness;

- Right of deletion: the right to request the definitive deletion of personal data;

- Right of restriction: the right to request us to temporarily or permanently stop processing all or some of your personal data;

- right of opposition:

- the right to object at any time to the processing of personal data on grounds relating to your specific situation;

- the right to object to the processing of personal data for direct marketing purposes; - the right to data portability: the right to request a copy of one's personal data in electronic format and the right to transmit such personal data for use in the service of others;

- the right not to be subject to an automated decision-making process: the right not to be subject to a decision based solely on an automated decision-making process, including with regard to profiling, if the decision has a legal effect on the user or entails an equally significant effect.

- the right to lodge a complaint with a supervisory authority: in Italy, this is the Garante per la Protezione dei Dati Personali.

# Personal data collected

The personal data we collect are user identification data (first name, last name, email and possibly telephone number, where provided by the user within the message).

Our website also collects anonymous data relating to site navigation, such as your IP address, the domain names of the computers used by users connecting to the sites, the URI (Uniform Resource Identifier) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

We use this data for the sole purpose of obtaining anonymous statistical information on the use of the sites and to check their correct functioning. The data may be used to ascertain responsibility in the event of hypothetical computer crimes. Except in this eventuality, such data will be stored on our computer systems for a period normally not exceeding thirty days.

# Authorisation to process

In order to enable you to exercise these rights easily and to register your preferences as to how we use your personal data, we have included 2/3/4 ticks at the time of registration indicating the permissions you grant us to process your personal data.

By ticking the processing authorisation under article 13 GDPR, you authorise us to contact you in order to respond to your contact (or quote) request and is necessary for us to keep your contact details on file and contact you in order to provide you with the requested service. You also authorise us to contact you and send you emails containing information about our services/products/events and promotions that may be of interest to you.

### Data Retention

Your data is processed internally and stored on servers protected by firewalls and antivirus software. Our web-agency that provides the hosting service may host some of your data, but does not have access to your data that is sent on our internal mail.

### Duration of treatment

Your data is only stored for as long as it is necessary to answer your contact request. If, on the other hand, you also select the authorisation to process data for commercial purposes (possibly to communicate your data to third party partners), the storage period is limited to 2 years, after which we will ask you for a new authorisation.

The personal data required for Customer/User registration are:

Name Surname E-mail Address POSTAL CODE Cities (such data are hereinafter also referred to as 'Customer Data'); The personal data required to fill in the Quote request form by the Customer/User: Name E-Mail Passengers Phone **Departure Date** Arrival date **Departure Time Time Arrival Departure Address Arrival Address** The Customer/User will therefore be allowed to send any notes that help the Company of the Data Controller to better provide the requested quotation and/or service.

Subsequently, if requested by the Holder, the Professional and/or the Location will have to provide their VAT number or tax code as well as an identity document.

To enable the provision of Platform services, the User must obligatorily provide the data indicated as necessary.

PURPOSE, LEGAL BASIS OF PROCESSING AND OPTIONALITY OF CONFERMENT

Personal data collected by the Controller through the use of the Platform will be processed, with the consent of the persons concerned, for the purposes described below:

A. allow the Client to i) request information and/or availability and/or a quotation for the provision of the services rendered by the chosen Data Controller's Company; ii) be put in contact with the Data Controller's Company; iii) evaluate the quotation received from the Data Controller's Company; and iv) choose the Data Controller's Company for a specific service offered by accepting and purchasing the same if it is already publicly available or by accepting a quotation provided by the same in relation to the request for the provision of a specific service;

B. allow the Data Controller's Company to receive requests for availability, information and quotations made by the Customer/User in order to send what has been requested;

C. allow the Customer to publish reviews on the Data Controller's company;

D. to send, via e-mail, text message, telephone and paper mail, communications of an informative nature (e.g. services, customer care, etc.) in relation to the Platform to those who explicitly request them, by entering their e-mail address and telephone number in the appropriate data collection form;

E. send, via e-mail, text message, telephone and paper mail, sales promotions of products and services distributed by the Controller;

F. carry out profiling by collecting and analysing personal data in order to process, communicate and enable the User to take advantage of the Controller's services designed according to the User's previously expressed habits and preferences;

G. Allow the customer to publish reviews;

H. Transfer the aforementioned personal data to third parties for autonomous marketing purposes where the user has specifically agreed to this by ticking, clicking, the appropriate authorisation option on the site when using or requesting a specific service.

For the purposes of points A, B, C and D, the Data Controller applies, as a legal basis for processing, the need to process personal data for the purposes of performing its service, in particular to enable the complete management of the process of requesting information, availability and obtaining a quotation and choosing the Data Controller's Company, pursuant to Article 6(b) of the Regulation.

For the purposes under E, F, G and H, the Controller applies, as a legal basis for processing, the consent expressed by the User for one or more specific purposes, pursuant to Article 6(a) of the Regulation.

The provision of data for the purposes set out in letters A to D as well as F to H is optional, but any refusal to provide the letters deemed necessary will make it impossible for the Data Controller to provide the services set out in the above letters.

In particular, for the purposes of points A to D as well as F to G, consent, although optional, is strictly necessary to allow the proper management of the process of choosing the Data Controller's Company as well as for the acceptance of the quote proposed by the latter.

With reference to the purposes set out under F, G and H, it is possible to unsubscribe from receiving commercial information and promotions at any time by sending a request email to the following email address of the Company <u>noleggio.bustravelservice@gmail.com</u> indicating the subscription email, your first name, last name and the User name chosen for the Account.

The provision of data for the purposes set out in letter C is optional, but a refusal will make it impossible for the Controller to provide the Customer with the possibility of reviewing the service referred to in the above letter.

The provision of data for the purposes referred to in letter H is optional. Any refusal will make it impossible for the Data Controller to transfer personal data to third parties for independent marketing purposes.

## METHODS OF PROCESSING AND STORAGE OF PERSONAL DATA

The Data Controller ensures that personal data are processed in full compliance with the Regulation, in paper and/or electronic format, also by means of automated procedures. Processing may also be carried out by means of automated tools designed to store, manage and transmit the data.

The data collected and processed will be protected with physical and logical methods such as to minimise the risks of unauthorised access, dissemination, loss and destruction of data, pursuant to Articles 25 and 32 of the Regulation.

Personal data will be stored in servers located within the European Union.

Data processing will last no longer than is necessary to fulfil the purposes for which it was collected.

Pursuant to Article 7(3) of the Regulation, the data subject shall have the right at any time and in an easy and quick manner to revoke consent to the processing and request the deletion of his or her personal data, by sending notice to the Data Controller.

Following the User's request for deletion, all of the User's personal data will be deleted, subject to any further retention required by law. Furthermore, in the event that the User has been reprimanded, suspended or sanctioned for fraudulent or suspicious behaviour, or if a User has requested deletion after publishing a request or review, or has sent a quotation, the Data Controller reserves the right to retain personal data relating to that User for a period of 2 (two) years from the request for deletion, in order to prevent the occurrence and/or recurrence of any fraud to the detriment of the Company itself (Data Controller).

If the Controller does not receive a cancellation request, in the event of the User's inactivity after two years from the date of their last access to the Platform, the Controller will send a request to the User to find out their intentions as to whether or not they wish to maintain their registration on the Platform. If no response is received within seven days of this request, the Owner will delete the User's data and therefore the User's account.

## **RECIPIENTS OF PERSONAL DATA**

The personal data collected may be processed by persons or categories of persons who act as data processors pursuant to Article 28 of the Regulation or who are authorised to process the data pursuant to Article 29 of the Regulation.

In addition, for some services, the data may be disclosed to companies that cooperate with or use the services of the Data Controller, such as system administrators, providers of website implementation services, payment providers and financial institutions.

## TRANSFER OF DATA TO A THIRD COUNTRY OR INTERNATIONAL ORGANISATION

Within the scope of the management of the contractual relationship, no transfer of User data to third countries outside the EU or to international organisations is envisaged.

## NAVIGATION DATA COLLECTION

The computer systems and the technical and software procedures underlying the operation of the Platform acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the access and operation mechanisms and protocols in use on the Internet.

Each time the User connects to the Platform and each time he or she calls up or requests content, access data is stored in our systems in the form of tabular or linear data files.

This category of data includes, for example, IP addresses, the domain names of the computers used by users connecting to the Platform, the request from the User's browser, in the form of addresses in URI (Uniform Resource Identifier) notation, the date and time of the request to the server, the method used in submitting the request to the server, the amount of data transmitted, the numerical code indicating the status of the response given by the server and other parameters relating to the User's operating system and computer environment.

This data may be used by the Owner in order to obtain anonymous statistical information on the use of the Platform in order to identify the pages preferred by Users and thus to provide increasingly appropriate content and to check its correct functioning. They may also be used, with the express consent of the User, to send communications and reminders (e.g. request for telephone contact).

At the request of the Authority, the data may be used to ascertain liability in the event of hypothetical computer crimes against the Platform or its Users.

### SEARCH ENGINE INFORMATION AND LOCATION DATA

The information on the services provided by the Data Controller's company advertised on the Platform and the reviews published by the Customer/User will be visible in searches performed in the internal search engine and may be made available to third-party search engines as the Platform allows its content to be indexed by third-party engines.

In the event that the page relating to the review or advertisement has already been removed from the Platform, it is possible that the cached copy will remain in the search results for a few days. The search results are not managed by the Platform, but the User can report the removal of the page and request the update of the cache copy directly to the search engine itself.

When using the Platform with the location tracking function enabled, the Platform may collect and process information about the User's current location. This data is processed anonymously, in a format that does not allow the User to be personally identified, and used for the sole purpose of facilitating the use of certain location-based features of the Platform. Location services can be activated or deactivated by the User at any time by accessing the settings on their device.

### **RIGHTS OF THE DATA SUBJECT**

Pursuant to Articles 15 to 22 of the Regulation, the User, as a data subject, is entitled to exercise specific rights concerning his/her personal data. In particular, the User, as data subject, has the right to obtain

confirmation as to whether or not personal data concerning him/her exist, even if not yet recorded, in a concise, transparent, intelligible and easily accessible form, using plain and clear language;

the indication:

the origin of personal data;

the purposes and methods of processing;

the legitimate interests pursued by the Controller or by third parties;

the possible recipients or categories of recipients of the personal data;

whether the Controller intends to transfer personal data to a third country or an international organisation;

the retention period of personal data;

the logic applied, as well as the importance and expected consequences of such processing for the data subject, in the event of processing carried out with the aid of electronic instruments as part of an automated collection and/or profiling process;

the identification details of the Data Controller, the Data Processors, the Designated Representative (if any) and the Data Protection Officer (DPO);

of the subjects and categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, as managers or appointees;

the possibility of lodging a complaint with a supervisory authority;

updating, rectification or, when interested, integration of the data;

the cancellation, transformation into anonymous form or blocking of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;

restriction of processing;

the portability of personal data concerning him to another data controller;

revocation of processing;

certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected; opposition, in whole or in part, on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection.

#### DATA CONTROLLER AND DATA PROCESSOR

In order to exercise the rights referred to in the preceding paragraph, the User, in his or her capacity as data subject, may at any time contact the Data Controller and/or the Data Processor for any communications

concerning the processing of his or her personal data, or to obtain the updated list of any Data Processors appointed by Bus Travel Service, by sending a communication to the contacts listed below:

The Data Controller

Bus Travel Service S.r.l.

Tax code/VAT number: 07734301000

Registered and Administrative Office: 00176 Rome (RM), Via Pietro Ruga n. 66

Mail: noleggio.bustravelservice@gmail.com

telephone no.: 0624408493

mobile no.: 3494630024

The Data Processor

Mr Piero Federici

Account deletion

The User may at any time proceed with the deletion of his or her data by writing to noleggio.bustravelservice@gmail.com indicating the subscription email, first name, last name and Account name.

#### CHANGES

This policy may be subject to change. So that the User is always up to date, the Controller invites him/her to visit this page periodically. Furthermore, if such changes have an impact on the data relating to the User (for example, if the Data Controller intends to process the User's personal data for purposes other than those previously communicated in this Policy), the Data Controller will inform the User before such changes take effect by publishing them as prominently as possible on the Platform.

Thank you for reading our Privacy Policy.

### COOKIE POLICY

### Our site contains cookies

Cookies, as you know, are pieces of information created by a server and stored on the hard disk of your computer or other device (your smartphone, tablet, netbook, etc.) that are useful for improving your browsing experience on the site and providing a better service to you. They store the data of your navigation within the site and transmit them back to you the next time you access the site, allowing you, for example, to return to the page you were visiting.

Cookies may be stored permanently on your computer or device and have a variable lifetime (so-called persistent cookies), but may also disappear when you close your browser or have a limited lifetime (so-called session cookies). They can be installed by the Site you are visiting (so-called first party cookies) or be installed by other websites (so-called third party cookies).

#### What cookies do we use?

- Browsing and functionality cookies: first-party session and persistent cookies+ are used on the Site to enable you to browse the Site safely and efficiently, also in order to improve the service.

- Analytical cookies: on the Site we use cookies from the Google Analytics platform to collect information on the use of the Site by users (number of visitors, pages visited, time spent on the site, etc.).

- Profiling cookies: third-party cookies are present on the Site to send advertising messages in line with the user's preferences.

- Social cookies: we use third-party cookies on the Site to allow users to interact with social networks (Facebook, Twitter, ...) and in particular to share content from the site via these social networks.

We are committed to protecting the personal data of our users. We take appropriate technical and organisational measures to protect the security of your personal data.

We may occasionally make changes to this Statement to reflect future changes to the site or legislation. Whenever we make material changes to this Policy, we will provide you with a prominent notice as appropriate, such as by displaying it on the website or by sending you an email.

This website uses cookies. We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about how you use our site with our web analytics, advertising and social media partners, who may combine it with other information you have provided to them or that they have collected from your use of their services.

Cookies are small text files that can be used by websites to make the user experience more efficient.

The law states that we may store cookies on your device if they are strictly necessary for the operation of this site. For all other types of cookies we need your consent.

This site uses different types of cookies. Some cookies are placed by third party services that appear on our pages.

You can change or revoke your consent from the Declaration of

cookies on our website.

Find out more about who we are, how you can contact us and how we process personal data in our Privacy Policy.

Specify your consent ID and the date of when you contacted us regarding your consent.

Your consent applies to the following websites: www.bustravelservice.com

Cookie Statement last updated on 17/04/24 by GuardLaw Studio Legale.