

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR)

ARCADIA EMME VIAGGI S.R.L. – ARCADIA TOUR OPERATOR & DMC

Introduction

Arcadia Emme Viaggi S.r.l. (hereinafter also “Arcadia” or the “Controller”) attaches particular importance to safeguarding confidentiality and protecting personal data.

Through this notice, prepared pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 (hereinafter the “GDPR”), Arcadia intends to provide clear and transparent information on how personal data processed in the course of its activities are collected, used, retained and protected.

This notice applies, insofar as Arcadia acts as Controller, to personal data collected through its corporate website, booking systems, commercial communications and contractual relationships with customers, travellers, travel agencies, tour operators, accommodation providers, suppliers and business partners.

1. Data Controller

ARCADIA EMME VIAGGI S.R.L.

Registered office: Viale Roma 61 – 47042 Cesenatico (FC), Italy

VAT number: 01196430407

Telephone: +39 0547 83090

Email: amministr@arcadiaviaggi.it

Website: www.arcadiaviaggi.it

For any requests concerning the processing of personal data and the exercise of rights under the GDPR, the Controller may be contacted at the email address indicated above.

2. Categories of personal data processed

In the course of its activities, Arcadia may collect and process the following categories of personal data:

- a) Personal and identification data: first name, surname, date and place of birth, nationality, residence and, where necessary, details of identity or travel documents.
- b) Contact data: email address, telephone number, postal address and other contact details provided by the data subject.
- c) Tourism service data: destinations, travel dates, stays, booked accommodation, number and ages of participants, excursions, tickets, transfers, ancillary services, preferences and booking-related requests.
- d) Administrative and contractual data: billing details, tax identification number, VAT number, payment information, amounts, refunds and contractual documentation.
- e) Professional and commercial data: company name, position, business contact details and information necessary to manage relationships with travel agencies, tour operators, accommodation providers and other partners.
- f) Browsing data: IP address, browser and device information, technical data, logs and information collected through cookies and similar technologies.
- g) Communications data: information contained in quotation requests, email communications, support requests and complaints.

In certain circumstances, for specific needs related to the organisation of tourism services, special categories of data under Article 9 of the GDPR may be processed, such as information relating to health, disabilities or particular assistance needs.

Such data will be processed only where necessary and where an appropriate condition for lawful processing under the GDPR applies.

3. Purposes and legal bases of processing

Personal data are processed for the purposes set out below.

3.1 Information and quotation requests

Handling requests received through the website, email, telephone and other corporate channels; preparing quotations and proposals concerning stays, travel packages, excursions, experiences and ancillary services.

Legal basis: Article 6(1)(b) GDPR where processing is necessary to take pre-contractual steps at the data subject's request; in other cases, where applicable, Article 6(1)(f) GDPR.

3.2 Bookings and organisation of tourism services

Managing, confirming and fulfilling hotel bookings, travel packages, visits, excursions, experiences, ticketing, transfers and other tourism services.

Processing may include disclosing data to suppliers responsible for providing the purchased services.

Legal basis: Article 6(1)(b) GDPR where the data subject is a party to the contract. For data received from intermediaries relating to travellers who are not direct contracting parties, the legal basis is determined according to the specific relationship and purposes of processing.

3.3 B2B commercial and contractual relationships

Managing relationships with travel agencies, tour operators, accommodation providers, suppliers, distributors and business partners, including contracts, correspondence, bookings and administrative activities.

Legal basis: Article 6(1)(b) and (f) GDPR, depending on the nature of the relationship and the data subject's position.

3.4 Administrative, tax and regulatory obligations

Managing invoicing, accounting, tax obligations and other requirements imposed by applicable law.

Legal basis: Article 6(1)(c) GDPR.

3.5 Customer support and complaint handling

Handling support requests, booking amendments, cancellations, refunds, disputes and legal claims.

Legal basis: performance of a contract, compliance with legal obligations or the Controller's legitimate interest in protecting its rights, as applicable.

3.6 Marketing and promotional communications

Sending newsletters, tourism offers, promotions, product and service updates, commercial initiatives and any communications relating to events or exhibitions.

Communications may be sent by email and other channels actually used by Arcadia, in accordance with applicable law.

Legal basis: the data subject's consent under Article 6(1)(a) GDPR, except where the law permits a different legal basis.

Consent is optional and may be withdrawn at any time.

Failure to consent to marketing does not affect the ability to request information, receive quotations or purchase tourism services.

4. Source of personal data

Personal data may be collected directly from the data subject or received from third parties, such as travel agencies, tour operators, booking portals, accommodation providers, suppliers and business partners.

In such circumstances, Arcadia processes the data for purposes relevant to its activities and, where required, provides the information specified in Article 14 GDPR within the applicable time limits, subject to the exceptions laid down in the Regulation.

5. Nature of the provision of data

Providing data necessary to handle requests, conclude and perform contracts and comply with legal obligations is required for the respective purposes.

Failure to provide such data may make it impossible to prepare a quotation, confirm a booking or provide the requested service.

Providing data for optional purposes, such as consent-based marketing, is voluntary and does not affect access to tourism services.

6. Processing methods and security measures

Personal data are processed using paper-based, IT and electronic means, in compliance with the GDPR principles of lawfulness, fairness, transparency, data minimisation, accuracy and storage limitation.

Arcadia implements appropriate technical and organisational measures to ensure a level of security proportionate to the risks, in order to prevent loss, destruction, unauthorised access, disclosure or unlawful processing of data.

Access to data is granted only to authorised personnel and entitled parties, within the limits of their respective duties.

7. Recipients of personal data

For the purposes described in this notice, personal data may, where necessary, be disclosed to the following categories of recipients:

- Accommodation facilities, hotels, resorts and other lodging providers;
- Organisers of excursions, guided tours, museums, attractions and tourism experiences;
- Transport and transfer service providers;
- Travel agencies, tour operators and tourism intermediaries;
- Booking and distribution platforms;
- Providers of management software, booking systems, IT services and hosting;
- Payment service providers and financial intermediaries;
- Administrative, tax, legal and professional advisers;
- Communications and marketing service providers;
- Public authorities and competent bodies, where required by law.

Recipients process data as independent controllers, joint controllers or processors, depending on their respective roles and applicable agreements.

Personal data are not disclosed indiscriminately to the public.

8. Transfers of data to third countries

In connection with the organisation of international tourism services and the use of technology platforms and providers, certain personal data may be transferred to countries outside the European Economic Area.

Where such transfers take place, they comply with Chapter V of the GDPR and are based on adequacy decisions, appropriate safeguards or specific derogations permitted by law.

9. Data retention period

Personal data are retained for no longer than is necessary to achieve the purposes for which they are processed, without prejudice to statutory retention obligations.

In particular:

- Administrative and accounting data: for the periods required by applicable law, ordinarily up to 10 years for documents subject to such an obligation.
- Booking and contractual data: for the duration of the relationship and the subsequent period necessary to comply with regulatory obligations or protect rights.
- Request and quotation data: for the time necessary to handle the request and any lawful commercial follow-up.
- Data used for marketing: for a period proportionate to the purposes and documented by the Controller, without prejudice to the right to withdraw consent.
- Technical and browsing data: for periods proportionate to the operational and security needs of the systems.

10. Processing of minors' data

In organising tourism services, Arcadia may process personal data relating to minors, solely to the extent necessary for booking and providing the requested services.

Where processing requires the consent of a person holding parental responsibility, such consent is obtained in accordance with applicable provisions.

11. Browsing data and cookies

The IT systems and software procedures used to operate the website www.arcadiaviaggi.it may, during their normal operation, acquire data whose transmission is inherent in the use of Internet protocols.

This information may include IP addresses, browser type, operating system, technical identifiers, addresses of requested resources, access times and browsing parameters.

These data are processed to ensure the website operates correctly, safeguard system security and, where necessary, establish liability in the event of cybercrime.

The website may also use cookies and similar technologies.

The use of non-essential tracking tools requiring consent is subject to obtaining the user's valid prior consent.

12. Automated decision-making and profiling

The Controller does not use data subjects' personal data for profiling activities, nor does it make decisions based solely on automated processing that produce legal effects concerning data subjects or similarly significantly affect them, within the meaning of Article 22 of Regulation (EU) 2016/679.

13. Rights of the data subject

Under Articles 15 et seq. of the GDPR, data subjects may exercise the following rights, in the cases and within the limits provided for by law:

Right of access (Art. 15): to obtain confirmation of processing and access their personal data.

Right to rectification (Art. 16): to have inaccurate data corrected or incomplete data completed.

Right to erasure (Art. 17): to request deletion of data in the cases provided for by the GDPR.

Right to restriction (Art. 18): to obtain restriction of processing in the circumstances provided for by law.

Right to data portability (Art. 20): to receive their data in a structured, commonly used and machine-readable format where the GDPR requirements are met.

Right to object (Art. 21): to object to processing in the cases provided for by law, including the right to object to direct marketing at any time.

Rights relating to automated decision-making (Art. 22): to benefit from the safeguards provided by the GDPR in relation to certain decisions based solely on automated processing.

Data subjects may also withdraw any consent previously given at any time, without affecting the lawfulness of processing carried out before withdrawal.

14. How to exercise rights

Requests relating to the processing of personal data may be sent to: amministrazione@arcadiaviaggi.it

Arcadia responds without undue delay and, as a rule, within one month of receiving the request, subject to extensions permitted by the GDPR.

15. Right to lodge a complaint

Data subjects who consider that the processing of their personal data infringes the GDPR have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), in accordance with Article 77 of the Regulation.

For further information, please consult the authority's website: www.garanteprivacy.it

The right to seek a judicial remedy before the competent courts remains unaffected.

16. Third-party links and services

Arcadia's website may contain links to websites, portals and platforms operated by third parties.

Processing carried out by such parties as independent controllers is governed by their respective privacy notices.

17. Changes and updates

Arcadia reserves the right to update this notice following changes in legislation, organisation, technology or the activities and services offered.

The updated version will be made available through the relevant corporate channels.

Last update of the draft: 29 October 2026.

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