

# **PRIVACY AND COOKIE POLICY**

This privacy and cookie policy (hereinafter, "**Privacy Policy**") refers to the website <https://www.noleggiobusmilano.eu/> (hereinafter, the "**Site**") and describes the activities and modality of processing of personal data created through the Site by NOLEGGIO BUS ROMA s.r.l. (hereinafter, "**Company**" or "**Data Controller**"), which is owned by the same and is registered by the same state with its own domain.

## **DATA CONTROLLER**

Pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter "**GDPR**"), and in relation to personal data, the Data Controller is: Noleggio Bus Roma s.r.l., current in 00187 Rome (RM) at via Ludovisi 35, Tax ID/VAT number IT12759121002, PEC [info@pec.noleggiobusroma.eu](mailto:info@pec.noleggiobusroma.eu).

The Company recognizes the importance of personal data and cares about those of its Users (hereinafter "**Users**" or "**Interested**") therefore undertakes to respect them and their correct processing. The Company processes the User's personal data (hereinafter "**Personal Data**") when the User visits the Site and uses the services and features available on the Site. The Privacy Policy has been drawn up in compliance with the GDPR, with Legislative Decree n.196/2003 as amended by Legislative Decree n.101/2018 as well as on the basis of the guidelines of the supervisory authority - the Guarantor for Privacy - and also represents information for the Interested parties pursuant to art. 13 of the GDPR and the applicable national legislation (collectively "**Privacy Law**"). The Privacy Policy specifies:

- who is the Data Controller;
- who controls and manages the Personal Data collected and processed through the Site;
- what personal information is collected - for what purposes and how the Personal Data are processed;
- the scope of communication of the same to third parties and any transfer abroad;
- the ways in which the User can verify the processing of Personal Data concerning him and exercise the rights recognized by the Privacy Law.

This information is provided only for the Site and for the activities carried out on the Site and the services provided therein by the Company also through its own data processors and not for other websites that may be consulted by the User via links and/or activities carried out by third parties. In case of consultation of other websites it is recommended to consult the respective privacy policies.

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## **1. LEGAL BASIS OF THE PROCESSING**

The legal bases identified and chosen for the processing of Personal Data are:

- a. as regards the response to your requests for contact, information and consultation of the Company, the legal basis of the processing is represented by that referred to in art. 6 lett. b) of the GDPR;
- b. as regards the navigation of the Site and the use of technical-analytical-third-party cookies, the legal bases are represented by art. 6 letters a) and f). In the first case, the Company is legitimized by Your explicit consent and to be freely affixed and to be revoked just as freely and at any time directly on the Cookie policy described below on the management of preferences; in the second case by the legitimate interest of the Data Controller.

## **2. PURPOSE AND MODALITY OF THE PROCESSING**

### **2.1 PURPOSE OF PROCESSING**

The purposes pursued by the processing are:

- a. the provision of rental services with driver and related tourist services, the establishment of pre-contractual negotiations with prospect customers-users and/or for the establishment and management of contractual relationships relating to the supply of transport services or for the execution of a task of public interest;
- b. analysis of the use and navigation of the various sections of the Site, of the analytics of the Site and of the related performances, therefore of generic marketing;

- c. anonymized analysis of preferences, habits, behaviors, interests inferred, by way of example, from online clicks on sections and touch points of the Site;
- d. send You personalized communications and carry out targeted promotional actions. The processing of Your Personal Data for profiling purposes will take place by third parties, or set by a website other than that of the Company and on servers other than that of the Site, as independent owners and on the basis of their privacy policies, as well as on the basis of Your explicit authorization for their use on the Site. This data processing tool relates the data collected during Your browsing on the sites through the use of third-party cookies if accepted, with the collected data. The interactions and information acquired through these tools are subject to the User's privacy settings relating to each social network and accessible only by the managers of the platforms themselves. The Company will only be given visibility to the aggregate data referring to visits to the Site. About the enabling or disabling of the installation on your internet browser of third-party cookies, described below to manage Your preferences and disable them in any moment;

## **2.2. MODALITY OF THE PROCESSING**

The data will be processed both manually and with the aid of electronic tools to:

- a. reply and manage the User's requests for information and/or support, to manage questions, communications or users feedback;
- b. provide the services requested through the Site, including administrative, accounting, fraud prevention services and activities, including the fulfillment of legal obligations, regulations and community legislation (including anti-money laundering legislation) and for the exercise of rights in judicial seat.

Personal Data will be kept for a period of time not exceeding that necessary to achieve the purposes for which they were collected and, in any case, not exceeding that required by applicable legislation.

Therefore, as regard to the Personal Data subject to consent given in relation to the installation of third-party cookies and for generic marketing, the storage times provided for are those established in the Cookie policy. In any case, the storage time in these cases will take place until the revocation of consent, at any time, by the User.

As for the pre-contractual, contractual and administrative management of the provision of services, the storage time will be equal to ten (10) years.

## **3. TYPES OF DATA PROCESSED**

### **3.1 NAVIGATION DATA**

The visit and consultation of the Site generally involve the collection and processing of the User's Personal Data limited to:

- a. Name, surname, nickname, gender;
- b. Contact details (telephone and e-mail) including business contact;
- c. Job position and/or organization to which it belongs if shared.

The processing of Personal Data of users who visit and consult the Site concerns:

- 1) Navigation data whose transmission is necessary for the operation of computer systems and programs necessary for the operation of the Site;
- 2) in association with other data, they allow the identification of users. This category includes, for example, IP addresses (internet protocol) or domain names of the computer used to visit the Site, as well as other parameters relating to the operating system used by the User to connect to the Site. The acquisition of navigation data takes place automatically and unavoidably and may be used for the sole purpose of obtaining statistical information and aggregate data on the use of the Site and verifying its correct functioning. It should be noted that on the website the IP addresses of the analytics are anonymized.

### **3.2 DATA PROVIDED VOLUNTARILY BY INDIVIDUAL USERS**

In addition, the Company collects and processes the Personal Data provided voluntarily by individual users that consist of those data collected by sending e-mails, interacting with the functionality of the Site in the appropriate touch points, requesting information/services offered by the Site, filling in other specific forms. The Personal Data that the Company collects and processes includes name and surname, nickname, gender, place, nationality, contact information such as: addresses, telephone numbers, e-mail, personal and related to the company position.

### **4. NATURE OF THE PROVISION OF DATA**

The provision of Personal Data is voluntary and refers to article 1 letter a) and article 2.1 letter a) above and relating to the Personal Data referred to in article 3, are necessary to allow the Company to reply to requests for information, provide the services requested through the Site, manage the functional activities to the services related to rental with driver. In case of failure to provide Personal Data for the aforementioned purposes, the Company will not be able to reply to requests for information, provide the services requested through the Site, manage the activities functional to the provision of services.

### **5. COMMUNICATION OF DATA**

Personal Data will not be subject to generic communication and will be accessible only to the Data Controller, but also to other subjects and under certain conditions. In fact, there may be communications for reasons related to the provision of services to colleagues duly trained or appointed external managers according to criteria of necessity. Personal Data may be made accessible to professionals and independent collaborators, also organized in an associated form, third party service providers of a professional and technical nature, functional to the processing purposes indicated in art. 2.1 and who assist the Company in the tax, social security, accounting and/or organizational fields, who will act as external Processors or Persons in charge of processing, as the case may be, without prejudice to the adoption by them of security criteria and protection of Personal Data in line with current legislation.

Finally, Personal Data may be communicated for administrative or judicial reasons to bodies, authorities, public institutions and legitimate recipients pursuant to the law in compliance with laws and regulations.

The complete and updated list of external Data Processors will be provided upon request to be formulated to the Company by PEC address [info@pec.noleggiobusroma.eu](mailto:info@pec.noleggiobusroma.eu).

Personal Data will in no case be subject to transfer or dissemination.

### **6. AUTOMATIC DATA COLLECTION MECHANISMS – COOKIES**

The Site uses cookies and other technologies to read and/or store information on the User's device, there are also buttons and widgets of Facebook and LinkedIn. These services allow you to interact with social networks and/or other external platforms directly on the Site. In order to provide a detailed description of these technologies, please consult the extended Cookie Policy described below and referred to here in full.

### **7. RIGHTS OF THE INTERESTED PARTY**

The User can exercise at any time the rights recognized by articles 15 – 22 of the GDPR, including for example the right to obtain confirmation of the existence or not of Personal Data concerning him, verify its content, origin and accuracy, request its integration, updating, rectification, cancellation, transformation into anonymous form, portability. The User may object in whole or in part, or request the limitation of the processing of data for legitimate reasons.

For any question or request about the processing of their Personal Data and to exercise the rights recognized by the GDPR, the User can contact the Company at the following address: [privacy@noleggiobusroma.eu](mailto:privacy@noleggiobusroma.eu) or at the PEC address [info@pec.noleggiobusroma.eu](mailto:info@pec.noleggiobusroma.eu).

### **8. COOKIE POLICY**

Cookies are small text files that the sites visited send to the user's terminal, where they are stored, and then retransmitted to the same sites on the next visit.

## 8.1 WHAT COOKIES WE USE

The Site uses technical cookies, both own and third-party. These cookies, being of a technical nature, do not require the prior consent of the User to be installed and used.

In particular, the cookies used on the Site are attributable to the following subcategories:

- navigation or session cookies, which guarantee the normal navigation and use of the Websites. Not being stored on the user's computer, they disappear when the browser is closed.
- analytical cookies, with which statistical information on the number of users and visits to the Websites is collected and analyzed. The site uses *Google Analytics* with anonymized IPs. These cookies are assimilated to technical ones.
- *social widgets and plugin*: some widgets and *plugins* made available by *social* networks may use their own *cookies* to facilitate interaction with the reference site.
- Google Map is a Google platform used to take over the headquarters of the Company. The user can voluntarily enter his position on the Google Map platform to reach the headquarters and access the navigation managed by Google and external to the Company website.
- reCaptcha is a Google service used for the prevention of SPAM when entering data in a FORM mail. The cookies generated are necessary for the security of the Company and the User who enters the data.
- Optional banner for brief information. The banner is optional as the website cookies are exclusively technical and is used only to communicate essential information to the User. This banner has its own cookie that stores the status of any closure of the brief information, in order not to show it later if there are no substantial changes in the Cookie Policy.

NAME	SUPPLIER	CATEGORY	PURPOSE	EXPIRATION	TYPE	SOURCE
rc::a	GOOGLE.COM	Necessary	Form Security	Persistent	HTML	reCaptcha
rc::c	GOOGLE.COM	Necessary	Form Security	Session	HTML	reCaptcha
_ga	noleggiobusmilano.eu	Statistical	statistics	2 years	HTTP	Google Analytics
_ga_#	noleggiobusmilano.eu	Statistical	statistics	2 years	HTTP	Google Analytics
CookieConsent	noleggiobusmilano.eu	Necessary	Stores the user's cookie consent status for the current domain	1 year	HTTP	Cookie Banner

## 8.2 COMMUNICATION OF THIRD-PARTY SERVICE PROVIDERS RELATED TO COOKIES

The third-party cookies installed on the Site are listed below. For each of them there is a link to the relative information on the processing of personal data carried out and on the methods for any deactivation of the cookies used. With regard to third-party cookies, the Data Controller is only obliged to include in this policy the link to the third-party website. On the other hand, this subject is obliged to provide information and indicate how to consent and/or disable cookies.

Google Analytics: <a href="#">Cookie Policy</a>   <a href="#">Privacy Policy</a>   <a href="#">Add-on to lock your data</a>	Facebook: <a href="#">Policy</a>	Linkedin: <a href="#">Policy</a>
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Cookies can be disabled by the user by changing the browser settings based on the instructions made available by the relevant providers at the links listed below.

<a href="#">Internet Explorer</a>	<a href="#">Microsoft Edge</a>	<a href="#">Mozilla Firefox</a>	<a href="#">Google Chrome</a>	<a href="#">Apple Safari</a>	<a href="#">Opera</a>
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## 9. UPDATES AND CHANGES TO THE PRIVACY POLICY

The Privacy Policy is subject to changes and updates and the version currently in force is the one published on the Site on **2022, April 2nd**. Changes to the Privacy Policy are communicated by publication on the Site. Please check the Privacy Policy periodically to be informed of any changes.