

Customer Information Form_INF-01	
Rev. 00	Revision date: 31/03/2026 Page 1 of 4

The purpose of this notice is to inform you about the processing of the personal data you have provided, in accordance with the applicable legislation on the protection of personal data. This notice is provided pursuant to Articles 13 and 14 of the European General Data Protection Regulation (hereinafter also referred to as the “GDPR”) and the relevant Italian legislation (hereinafter collectively referred to as the “**Applicable Legislation**”). This policy may be subject to amendments and/or additions and/or updates, including as a result of updates to the applicable data protection legislation.

1. Data Controller.

The Data Controller is the company Lake Garda Travels S.r.l., with registered office at Via Portici Umberto Primo, 2/3 – 37018 Malcesine (VR), Tax Code and VAT No. 04242010231, REA No. VR-404367, Share capital €58,824.00, hereinafter also referred to as **the “Data Controller”** or simply “**Controller**”.

For any clarification, information or to exercise the rights listed in this Policy, you may contact the Data Controller at the following details: +39 045 7401122, email: admin@lakegardatravels.com , certified email (PEC): lakegardatravels@pec.it .

2. Purposes and legal bases of the processing.

The Data Controller collects and processes data relating to the customer, the personal identification and contact details of natural persons acting in the name and on behalf of the customer and/or in their interest, and the details of participants in the experience/tour – such as travellers and group members – when the booking is made by a third party such as a group leader or company representative (hereinafter referred to, respectively, as the “Data” and the “Data Subjects”) such as first name, surname, email address, telephone number, booking details, date, time, number of participants, language, meeting point and other information necessary for the provision of the service.

For the processing of personal data relating to other participants in the experience/tour, please ensure that the contents of this policy are duly communicated.

Data may be collected:

- directly (website, points of sale, email/telephone contacts);
- indirectly via booking platforms/marketplaces (OTAs) and related distribution channels that transmit the data necessary for the provision of the service to us.

Examples of platforms/channels through which bookings may be received: GetYourGuide, TripAdvisor, and platforms linked to the Bókun management system (e.g. Musement, Winedering, Toursexplorer, Nowthingstodo).

	PURPOSE	LEGAL BASIS
a.	Managing pre-contractual relations; managing and executing the contract and all related activities (including after-sales service), such as service confirmation and management, tour organisation, customer support, and operational communications (e.g. changes weather/timetables or logistics).	The processing is necessary for the performance of a contract to which the data subject is party or for the implementation of pre-contractual measures taken at the data subject’s request [Article 6(1)(b) of the GDPR].

b.	To fulfil administrative and/or accounting and/or tax obligations related to contracts entered into with the customer (for example, management of collections and payments, issuing of invoices) and to fulfil the further legal obligations to which the Data Controller is subject, including those under current legislation on the protection of personal data.	The processing is necessary for compliance with a legal obligation to which the Data Controller is subject [Article 6(1)(c) of the GDPR].
c.	To take all necessary precautions to indemnify the Data Controller and/or its employees and/or associates against any liability arising from a breach of the terms of contracts entered into with the client and, more generally, to establish, exercise or defend a right in or out of court and/or whenever the judicial authorities exercise their functions (e.g. for complaints and disputes)	The processing is necessary to pursue the Data Controller's legitimate interest in being held harmless from any liability and in establishing, exercising or defending a right in court or before a judicial authority or whenever the judicial authorities exercise their functions [Article 6(1)(f) of the GDPR]. Processing based on legitimate interest has been subject to a comparative assessment (balancing test) between our interests and the rights and freedoms of the data subject. The data subject may object to the processing at any time on grounds related to their particular (Article 21 of the GDPR).
d.	Processing of special categories of data (Article 9 of the GDPR): should you voluntarily provide us with information relating, for example, to allergies, intolerances or disabilities, we will process such data solely for the purpose of safely managing your experience and, where necessary, will share it only with those involved in providing the service.	The provision of special categories of data (e.g. disabilities, allergies, dietary preferences) is optional. If such information is not provided, we may not be able to take the specific precautions required to provide the service. If such information is provided to us via booking notes or other channels, we may request explicit consent before using it and/or sharing it with the relevant suppliers (e.g. accommodation providers, guides, restaurants) solely for the purpose of managing the requested experience. [Art. 6(1)(a) of the GDPR] and [Art. 9(2)(a) of the GDPR].

3. Data retention period.

Data will be retained for a period not exceeding that necessary to fulfil the purposes indicated above and, in any event, not beyond the following maximum retention periods:

- contractual and tax data: 10 years (civil and tax obligations);
- contact details and operational data: for a period of 12 months following the conclusion of the service. In the event of complaints, disputes or requests for post-service assistance, the data may be retained until the case is closed and, if necessary, until the expiry of the applicable limitation periods;
- special categories of data (allergies/disabilities): for the time strictly necessary to manage the service safely, and in any case deleted or anonymised as soon as they are no longer required.

4. Nature of the provision.

The provision of Data is necessary for the conclusion of contracts, their performance and the fulfilment of the legal obligations incumbent upon the Data Controller. Therefore, any refusal to provide such data, in whole or in part, may result in the Data Controller being unable to conclude contracts and/or to perform them.

5. Methods of data processing.

Processing is carried out using IT tools and/or paper-based methods, adopting appropriate technical and organisational measures in accordance with Article 32 of the GDPR (e.g. access management, tracking/logging, backups, authorisation procedures and staff instructions).

We use booking management software (booking engine/channel manager), including the Bókun platform for the operational management of bookings and the synchronisation of availability across sales channels, with storage on cloud infrastructure and appropriate security measures (e.g. access control, tracking, backups).

6. Recipients of the Data.

Data may be disclosed, to the extent necessary, to:

- authorised and trained internal staff;
- suppliers and operational partners involved in the provision of the service (e.g. tour guides, skippers, transport providers), who will process the data solely for the purpose of managing the service;
- IT and management platform providers (e.g. Bókun and other tools), acting as Data Processors pursuant to Article 28 of the GDPR, where applicable;
- Accounting and tax advisers (e.g. accountants), credit institutions and/or payment service providers, as well as invoicing/accounting service providers, to the extent necessary for compliance with legal obligations and the management of payments;
- public authorities/competent bodies, where required by law.

Certain entities (e.g. carriers or accommodation providers) may act as independent data controllers if they independently determine the purposes and means of processing; in such cases, their respective privacy notices apply.

7. Transfers to third countries or international organisations.

As a rule, data is processed within the EEA. Should transfers to non-EEA countries be necessary via technology providers or platforms, the Data Controller will implement appropriate safeguards (e.g. third countries with adequacy decisions or Standard Contractual Clauses approved by the European Commission) and, where required, additional measures.

Further information on transfers (including the providers involved and the safeguards adopted, e.g. SCCs) is available upon request from the data subject.

8. Rights of the data subject.

At any time, you, as the data subject, may exercise the following rights:

- in accordance with the terms and conditions set out in Article 15 of the GDPR, to obtain confirmation as to whether or not personal data concerning you are being processed and, if so, to obtain access to your personal data and to information regarding their processing;
- in accordance with and subject to the conditions set out in Article 16 of the GDPR, to have inaccurate personal data concerning you rectified and/or to have incomplete data completed, including by providing a supplementary statement;
- in accordance with the terms and conditions set out in Article 17 of the GDPR, to have your personal data erased or, where possible, made anonymous: a) if they are no longer necessary in relation to the purposes for which they were collected or subsequently processed; b) if you withdraw any consent you may have given on which the processing is based and there is no other legal basis; c) where you have objected to the processing of your personal data carried out to pursue a legitimate interest of the Data Controller and there are no overriding legitimate grounds for continuing it; d) your personal data has been unlawfully processed; e) your personal data must be erased in compliance with a legal obligation;

- in accordance with the terms and conditions set out in Article 18 of the GDPR, to obtain the restriction of processing in the event that:
 - a) you contest the accuracy of your personal data, for the period necessary for the data controller to carry out the necessary checks;
 - b) your personal data has been processed unlawfully and you object to its erasure, requesting that its use be restricted;
 - c) your personal data, even if no longer required for the purposes of processing, is necessary for you to establish, exercise or defend your rights in court;
 - d) you have objected to the processing, pending verification of whether the Data Controller's legitimate grounds override your legitimate interests;
- in accordance with the terms and conditions set out in Article 19 of the GDPR, to have the Data Controller notify each recipient to whom your personal data has been disclosed of any rectifications, erasures or restrictions on processing carried out, unless this proves impossible or involves a disproportionate effort;
- in accordance with the terms and conditions set out in Article 20 of the GDPR, where the processing is based on a contract or consent and is carried out by automated means, to receive, without hindrance and in a structured, commonly used and machine-readable format, the personal data concerning you in order to transmit it to another controller or – where technically feasible – to have the Data Controller transmit it directly to another controller;
- in accordance with the terms and conditions set out in Article 21 of the GDPR, to object, in whole or in part, on legitimate grounds relating to your particular situation, to the processing of personal data concerning you, even if such data is relevant to the purpose for which it was collected;
- in accordance with the terms and conditions set out in Article 22 of the GDPR, not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

To exercise the rights listed above, you may send a written request using the contact details provided above.

Furthermore, in accordance with the terms and conditions set out in Article 77 of the GDPR and Articles 140-bis to 143 of Legislative Decree No. 196 of 30 June 2003, as amended and supplemented, if you consider that your rights under the legislation on the protection of personal data have been infringed, you may lodge a complaint with the Italian Data Protection Authority, based in Rome at Piazza Montecitorio 121, website www.garanteprivacy.it, email garante@gpdp.it , certified email protocollo@pec.gpdp.it .

9. Updates

This policy may be updated. The current version is the one published on our website and/or made available prior to booking.