

## PRIVACY AND COOKIE POLICY of noleggiobusroma.eu

This policy describes the procedures followed by **Noleggio Bus Roma Srl** (hereinafter referred to as the “**Owner**”) in relation to the processing of personal data collected through the website [www.noleggiobusroma.eu](http://www.noleggiobusroma.eu) (hereinafter referred to as the “**Website**”).

Except where specified otherwise, this policy is valid also as providing the necessary information required by Art. 13 of the Legislative Decree 196/2003 (hereinafter referred to as “**Code**”) and of Art. 13 of the EU Regulation n. 2016/679 (hereinafter referred to as “**GDPR**”) for any individual who chooses to use or interact with the Website (hereinafter referred to as the “**User**”).

### Data Controller and Data Processor

The data controller and data processor is **Noleggio Bus Roma Srl** with legal headquarters in Roma, Via Ludovisi 35, email [info@noleggiobusroma.eu](mailto:info@noleggiobusroma.eu).

### Agent responsible for the protection of data and contact information

The data protection officer can be contacted via email at the following address: [info@noleggiobusroma.eu](mailto:info@noleggiobusroma.eu).

### Type of data processed and its uses

Through the Website the following data can be collected and processed:

1. **Navigation data** collected in an automated manner, exclusively in the form of aggregate and anonymous data, to verify the correct functioning of the Website. None of this information is associated with the User of the Website (physical person), and the identification of the User is not allowed (from 25 May 2018 this information is processed based on the legitimate needs of the Owner). The Google Analytics code is installed with anonymity provided for the visitor and used only for statistical reasons and without the IP address of the website. Here are some examples of the navigation data stored by Google Analytics, which do not identify the single individual but are used for statistical purposes only: type of browser, approximate location identified by the service provider, information about the device used (PC, Tablet or cell phone) and all the other settings that Google Analytics inserts by default, as well as the data from cookies described below (for cookies please note: each User can decide to allow or not based on his/her own preferences).
2. **Personal data supplied voluntarily by the User** by filling out the form present on the Website, or sent via email to the address present on the Website, to request information about the activities conducted and for the reservation of the services within the Website, where the User supplies his/her personal contacts, invoice information and type of payment selected.
3. For whomever has expressly consented to the use of certain data that has been supplied for the **purpose of marketing**, such as email address, which could be used to inform you about activities of reporting, company information, news that could be of interest to you, etc. In particular we use them to:
  - Communicate promotional activities, technical-commercial and advertising about events, initiatives and partnerships, via email or telephone;
  - Sending periodic newsletters.

If you are less than 16-years-old you are not allowed to give us any personal data, and in any case we do not take responsibility for false statements supplied by you. In the case that we become aware of statements that are not true we will proceed with the immediate cancellation of all personal data collected.

If you supply the personal data of a third party, for example those of your family or friends, you must be sure that these persons have been given adequate information and consented to the collection and processing of data in the ways described here within.

### Providing data and the consequences of not providing data

#### Providing personal data for the purposes above is:

- ✓ Obligatory for #1 (navigation data) and without request for express consent, as this is technical data needed for navigation and not able to be deactivated by the User;
- ✓ Obligatory for #2 (data supplied voluntarily) and without supplying such data the only consequence is the inability by the Owner to manage and complete the requests of the User;
- ✓ Optional for #3 (marketing data) and at User/client choice.

### Modes of processing and protection

Data is collected from subjects according to the indications laid out by the legislation of reference, with particular attention to the security measures outlined by the GDPR (art. 32) for the processing of data using computer or paper tools, automated, with a logic strictly related to the purposes previously indicated and in any case in order to guarantee the security and confidentiality of the data.

Besides the Owner, in order to carry out the request made by you, in some cases it may be necessary to give access to data to other responsible parties involved in the running of the website (administrative personnel, commercial, marketing,

legal, system administrator) or external people (such as third party suppliers of technical services, mail service personnel, hosting provider, company partners, PR agencies). The data is always processed in compliance with the law.

### **Recipients or types of recipients**

Personal data may be made available, brought to the attention of, or communicated to the following persons, who will be appointed according to each case, as person in charge or appointee.

Public or private entities, natural or legal persons, of which the Owner uses for the performance of the activities instrumental in achieving the purposes listed above or to which the Owner is required to communicate their personal data because of legal, fiscal, judicial or contractual obligations.

In any case, the personal data will not be disseminated voluntarily.

### **Storage period**

Data will be stored from the date of its collection in the Website until the request by the User to voluntarily cancel the data. For data collected via the Website, through the email or contact form, it will be stored for the duration of 2 years if no further activity, collaboration, or contract was made between the parties. Otherwise the data will be stored for 10 years in order to fulfill the legal requirements, both fiscal and work related.

- ✓ Data collected for the purpose of marketing described in #3 will be stored for the duration of 24 months.
- ✓ The statistical data collected by Google Analytics will be stored on the indicated platform for the duration of 26 months.

### **Transfer of data to countries outside the EU**

This Website could share some of the data collected with service providers located outside the European Union, in particular with Google, Facebook, Twitter and LinkedIn through social media plugins and the service of Google Analytics. The transfer is authorized according to the specific decision of the European Union and the Authority for the protection of personal data, in particular the decision 1250/2016 (Privacy Shield – here is the information page for the Italian Data Protection Authority), therefore further consent is not required. The businesses listed above guarantee their adherence to the Privacy Shield.

### **Rights for access, cancellation, limitations and portability**

For the User, rights are pursuant to Art. 7 of the Code and from Art. 15 to 20 of GDPR. For example, an interested party could:

- a) Obtain a confirmation that he/she is currently having his/her personal data collected;
- b) For those who have had data collected, obtain access to the personal data and to other information relative to the collection and also request a copy of the personal data;
- c) Obtain a correction of any incorrect personal data and the completion of any incomplete personal data;
- d) Obtain, should one of the conditions be met provided for in Art. 17 of GDPR, the cancellation of his/her personal data;
- e) Obtain, in the cases referred to in art. 18 del GDPR, the limitation of personal data processing;
- f) Receive the personal data concerning him/her in a structured format, commonly used and legible by an automatic device and ask for their transmission to another person, if technically possible.

### **Right to Object**

Each interested party has the right to object at any time to the processing of his/her personal data by the Owner in the pursuit of legitimate interests. In the case of an objection, his/her personal data will no longer be processed as long as there are no legitimate reasons to proceed with the processing that supersede the interests, rights, and freedom of the interested party or for the investigation, the exercising, or the defense of a right in a court of law.

### **Right to file a complaint to the Authority**

Furthermore, any interested party can file a complaint with the Italian Data Protection Authority in the case that he/she believes his/her rights provided by the Code and the GDPR have been violated. The complaint can be made following the instructions found on the Authority website accessible at the address:

[https://www.garanteprivacy.it/web/guest/home\\_en](https://www.garanteprivacy.it/web/guest/home_en)

**Updates:** this Privacy Policy is subject to updates. The Owner invites the User who wants to stay informed about the modes of processing of personal data collected by the Website to periodically revisit this page.

## Cookies

Cookies are small text files that a website sends to the User's device, where they are memorized, then they are retransmitted to the same website during the next visit.

This Website utilizes technical cookies, both its own and third party. These cookies, being technical in nature, do not require the prior consent of the User to be installed and utilized.

In particular, the cookies utilized by the Website can be attributed to the following subcategories:

- ✓ Cookies from navigation or a session that guarantee the normal navigation or use of the Website. These are not memorized by the User's computer and disappear after closing the browser.
- ✓ Analytic cookies, with which the statistical information about the number of users and visits to websites are collected and analyzed.
- ✓ *Social widgets and plugins*: some *widgets* and *plugins* supplied by *social networks* can use their own *cookies* to facilitate the interaction with the referred website.

The following is a list of cookies from third parties installed on the Website. For each of these there is a link to the relevant information about the collection and processing of personal data done and the way in which the utilization of cookies can be deactivated. Regarding the cookies used by third parties, the Owner's only requirement is to insert in this policy a link to the website of the third party. It is the responsibility of that entity to supply information and instructions about the methods for eventual consent and/or deactivation of the cookies.

Google Analytics: <a href="#">Information</a>   <a href="#">Advanced components for blocking your personal data</a>	Facebook: <a href="#">Information</a>	Linkedin: <a href="#">Information</a>	Twitter: <a href="#">Information</a>
---	---------------------------------------	---------------------------------------	--------------------------------------

Cookies can be disabled by the User by modifying the browser settings by following the instructions supplied by each of the suppliers with the links below.

<a href="#">Internet Explorer</a>	<a href="#">Mozilla Firefox</a>	<a href="#">Google Chrome</a>	<a href="#">Apple Safari</a>	<a href="#">Opera</a>
-----------------------------------	---------------------------------	-------------------------------	------------------------------	-----------------------