

Privacy Policy of FLY FLOT srl – a socio unico

Data Controller

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The purposes of processing

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;

processing is necessary for compliance with a legal obligation to which the Owner is subject;

processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed. Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon

order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

Types of Data collected

Payment management via PayPal (Paypal)

The payment management services allow this Website to process payments by credit card, bank transfer or other tools. The data used for payment are acquired directly by the requested payment service manager without being processed in any way by this Website.

Some of these services may also allow the scheduled sending of messages to the User, such as emails containing invoices or notifications regarding payment.

PayPal (Paypal)

PayPal is a payment service provided by PayPal Inc., which allows the User to make online payments.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: See the Paypal privacy policy - [Privacy Policy](#).

Details on the processing of Personal Data: Contact the User

Mailing list or newsletter (this Website) By registering with the mailing list or newsletter, the User's email address is automatically added to a list of contacts to which email messages containing information, including commercial and promotional information, relating to this Website may be transmitted. User's email address may also be added to this list as a result of registering on this Website or after making a purchase.

Personal Data collected: ZIP code, city, surname, email address, country, name, telephone number, province and company name.

Contact form (this Website)

By filling in the contact form with their data, the User consents to their use to respond to requests for information, quotes, or any other nature indicated by the form header. Personal Data collected: city, surname, email, address, name, telephone number, profession, province, company name and various types of Data.

Tag management

This type of service is functional to the centralized management of the tags or scripts used on this Website. The use of these services involves the flow of User Data through them and, where appropriate, their retention.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage data.

Place of processing: Ireland - [Privacy Policy](#).

SPAM protection

This type of service analyzes the traffic of this Website, potentially containing Users' Personal Data, in order to filter it from parts of traffic, messages and contents recognized as SPAM.

Google reCAPTCHA (Google Ireland Limited)

Google reCAPTCHA is a SPAM protection service provided by Google Ireland Limited.

Use of the reCAPTCHA system is subject to Google's privacy policy and terms of use.

Personal Data processed: Cookies; Usage data.

Place of processing: Ireland - [Privacy Policy](#)

Use of Google Analytics for statistics

The services contained in this section allow the Data Controller to monitor and analyze traffic data and are used to keep track of User behavior.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Website, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualize and personalize the advertisements of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States -

Interaction with external social networks and platforms: Facebook

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website. The interactions and information acquired from this Website are in any case subject to the User's privacy settings relating to any social network. In the event that an interaction service with social networks is installed, it is possible that, even if the Users do not use the service, it collects traffic data relating to the pages in which it is installed.

Like button and Facebook social widgets (Facebook, Inc.)

The "Like" button and Facebook social widgets are interaction services with the Facebook social network, provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data. Place of processing: United States - [Privacy Policy](#)

Remarketing e behavioral targeting

This type of service allows this Website and its partners to communicate, optimize and serve advertisements based on the past use of this Website by the User.

This activity is facilitated by the tracking of Usage Data and the use of Tracking Tools to collect information which is then transferred to the partners who manage the remarketing and behavioral targeting activities.

Some services offer a remarketing option based on email address lists.

In addition to the opt-out features offered by the services listed below, the User can opt-out by visiting the opt-out page of the Network Advertising Initiative. Users can also choose not to participate in certain advertising features through the corresponding device configuration options, such as the mobile device advertising configuration options or the generic advertising configuration.

Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Website with the Facebook advertising network. Personal Data processed: Cookies; Usage data.

Place of processing: United States - [Privacy Policy](#) – [Opt Out](#).

Remarketing with Google Analytics (Google Ireland Limited)

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the tracking activity carried out by Google Analytics and its Cookies with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Cookies; Usage data.

Place of processing: Ireland - [Privacy Policy](#)

Google Ads Remarketing (Google Ireland Limited)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google Ireland Limited that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

Users can choose not to use Google cookies for ad personalization by visiting the Google ad settings.

Personal Data processed: Cookies; Usage data.

Place of processing: Ireland - [Privacy Policy](#)

Interaction with external social networks and platforms: YouTube

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website.

The interactions and information acquired from this Website are in any case subject to the User's privacy settings relating to each social network.

In the event that an interaction service with social networks is installed, it is possible that, even if the Users do not use the service, it collects traffic data relating to the pages in which it is installed.

YouTube button and social widgets (Google Inc.)

The YouTube button and social widgets are interaction services with the YouTube social network, provided by Google Inc.

Personal data collected: Usage data.

Place of processing: United States - [Privacy Policy](#). Subject adhering to the Privacy Shield.

Viewing content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. In the event that a service of this type is installed, it is possible that, even if the Users do not use the service, it collects traffic data relating to the pages in which it is installed.

YouTube Video Widget (Google Inc.)

YouTube is a video content viewing service managed by Google Inc. that allows this Website to integrate such content within its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#). Subject adhering to the Privacy Shield.

Location-based interactions

Non-continuous geolocation (this Website)

This Website may collect, use and share Data relating to the User's geographical location, in order to provide services based on the location itself. Most browsers and devices provide tools by default to deny geo-tracking. If the User has expressly authorized this possibility, this Website may receive information on its actual geographical position.

The geographical location of the User occurs in a non-continuous manner, upon specific request of the User or when the User does not indicate the place where he is located in the appropriate field and allows the application to automatically detect the position.

Personal data collected: geographic position.

Display of content from external Google Maps platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website and interact with them. In the event that a service of this type is installed, it is possible that, even if the Users do not use the service, it collects traffic data relating to the pages in which it is installed.

Google Maps widget (Google Inc.)

Google Maps is a map viewing service managed by Google Inc. that allows this Website to integrate such content within its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#)

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this

document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Cookie Policy

Identity and contact details of the data controller

The data controller is: FLY FLOT srl – a socio unico Via Isorella, 47
25012 Calvisano - (Brescia) ITALY
Tel: +39 030 96 89 00

Capitale sociale i.v. € 2.000.000,00 P.iva, C.F. 03277360982 Owner's email address: privacy@flyflot.it Data Protection Officer (DPO) The DPO designated by FLY FLOT srl – a socio unico represents the contact point for interested parties and can be reached through the following channels: Mail: privacy@flyflot.it

Our Cookie Policy is intended to describe the types of cookies present on our site (here in after the "Site"), the purposes, duration and ways in which the User can manage cookies.

WHAT ARE COOKIES

A "cookie" is a small text file created on the user's computer when he accesses a particular site, with the purpose of storing and transporting information. Cookies are sent from a web server (which is the computer on which the website visited is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and stored on the latter's computer; they are then re-sent to the website on subsequent visits. Cookies have the purpose of collecting and storing data relating to the User in order to make the site simpler, faster and more in line with his requests. Such data can remain in the user's device for various periods of time, such as a browser session, a few hours, several days or longer periods. The User can block cookies, delete them or deactivate them in the device or browser settings as indicated below in the paragraph relating to "Disabling cookies".

TYPES OF COOKIES

There are two macro-categories of cookies: technical cookies and profiling cookies.

Technical cookies are necessary for the correct functioning of a website and to allow the user to navigate. Among these technical cookies there are the so-called "strictly necessary" cookies, which enable functions, without which it would not be possible to fully use the site. These cookies are only saved on the user's computer during the current browser session. Essential cookies cannot be disabled using the functions of the Site. Technical cookies also include those used to statistically analyze accesses or visits to the site, also called "analytics", which pursue exclusively statistical purposes (not marketing or profiling) and collect information in aggregate form without the possibility of tracing the identification of the individual user. Essential cookies cannot be disabled using the functions of this website.

Profiling cookies, on the other hand, have the task of creating user profiles in order to send advertising messages in line with the preferences shown by the user while browsing. The use of profiling cookies, unlike technical cookies, requires the prior acquisition of the user's free consent which the Site acquires in accordance with the Provision of the Guarantor of 8 May 2014 and the Provision 10 June 2021 n. 231. Cookies can be deactivated completely in your browser at any time. Cookies can also be classified as:

- "session" cookies: these cookies are not stored permanently on the user/visitor's device and disappear when the browser is closed. They are used in order to transmit the session identifiers necessary to allow safe and efficient exploration of the site.
- "persistent" cookies: these cookies remain stored, until they expire, on the user's/visitor's device. They are used, for example, to recognize the device that connects to a site, facilitating authentication operations for the user;
- "first-party" cookies: they can be both persistent and session; they are managed directly by the owner and/or manager of the site and are used, for example, to guarantee its technical functioning (the so-called "technical cookies") or keep track of preferences expressed regarding the use of the site itself;
- "third-party" cookies: they can be both persistent and session; are generated and managed by managers unrelated to the site visited by the user and are used, for example, to know the number of pages visited within the site itself (so-called "statistical cookies" or "analytics cookies") or to publish content or advertising on the site you are visiting.

PROVISION AND MANAGEMENT OF COOKIES

With the exception of technical cookies strictly necessary for normal navigation, the interested party can avoid the installation of cookies.

Disabling cookies

Without prejudice to the foregoing in relation to cookies strictly necessary for navigation, the user can eliminate the other cookies (profiling) via his browser. Each browser has different procedures for managing settings. The user

can obtain specific instructions through the links below.

Apple Safari: <https://support.apple.com/it-it/guide/safari/manage-cookies-and-website-data-sfri11471/>

Google Chrome: <https://support.google.com/chrome/answer/95647>

Mozilla Firefox: <https://support.mozilla.org/kb/enable-and-disable-cookies-website-preferences>

Internet Explorer: <http://windows.microsoft.com/internet-explorer/delete-manage-cookies>

Microsoft Edge: <https://support.microsoft.com/it-it/help/4027947/microsoft-edge-delete-cookies>

Opera: <https://www.opera.com/help/tutorials/security/privacy/>

The deactivation of third-party profiling cookies is also possible through the methods made available directly by the third-party owner company for said treatment, as well as as possibly indicated by the publisher of the site concerned.