

PASSO TOURISMO - PRIVACY POLICY

1. General

Passo Turismo GmbH, Elsässer Strasse 32, 81667 Munich, Federal Republic of Germany (“Passo Turismo”) respects the privacy of customers and users of its platform. This Data Protection Policy lays down provisions on the protection and processing (collection, processing, use and disclosure) of the personal data collected by Passo Turismo from customers and users of its platform.

Passo Turismo observes the German Data Protection Act (Datenschutzgesetz) and the data protection law of the EU (collectively “applicable data protection law”). Customers and users need to provide their personal data to use Passo Turismo’s services.

2. Types Of Personal Data

2.1 Data collected directly from customers/users to implement a contract.

Passo Turismo collects the following data from its customers and users:

- Basic data (first name and surname (including title), address, email address, telephone number, date of birth) when a user contacts a customer,
- Data on the Listing posted,
- Data on the services/products provided by Passo Turismo,
- Data on contact between users/customers and Passo Turismo (including copies of all messages that are sent directly through the Passo Turismo E-mail System).

2.2 Data collected automatically to optimise services (analytics tools)

2.2.1 Usage analysis by Passo Turismo

Passo Turismo does not analyse customer/user behaviour on its platform using cookies.

Cookies are packets of data that are sent from Passo Turismo’s web server to your browser, saved on your computer and retrieved by the web server again during subsequent visits.

2.2.2 Usage analysis by Google Analytics

The Passo Turismo Platform also uses Google Analytics, a web analytics service provided by Google Inc. (“Google”). Google Analytics uses cookies to provide its web analytics services. The information generated by the cookies about your use of this website (including your IP address) is transferred to a Google server that may be outside EU and stored there. Google uses this information to analyse your use of the website, compile reports on website activity for the website operators and provide other services related to use of the website and the internet. Google may also transfer this information to third parties, if required to do so by law or if third parties process this information on Google's behalf. Customers and/or Users can prevent cookies being installed by using the appropriate setting in their browser software; Passo Turismo would, however, like to point out that doing so will mean that not all of the website’s functions may be used to their fullest extent. By using this website Customers and/or Users agree to allow Google to process the data collected about them in the manner described above and for the purposes described above. For further information on Google Analytics, Passo Turismo recommends you visit the following website: <https://www.google.com/analytics/terms/>.

3. Intended Use Of The Data Collected

Passo Turismo processes customer/user data for the following purposes:

- to perform contracts/services (establish contact between customers and users, process orders, reservations and to fulfil bookings and rentals),
- to safeguard payment transactions between customers and users,
- to communicate with customers and users,
- to fulfil legal obligations,
- to improve Passo Turismo’s products and services and their position on the market (including dispatching the newsletter, if you have subscribed),
- to compile statistics on contact made through the Passo Turismo platform.

4. Data Processing By Third Parties In The EU And Abroad

Passo Turismo may also have personal data processed by third parties in the EU and/or abroad for the purpose of running the platform and for the purposes stated in Section 3.

4.1 Categories of external service providers

Such recipients of personal data include suppliers in the field of payment services, password administration, platforms for managing dispatch of the newsletter, logistics companies and data centres for storing and processing the data collected. When doing so, Passo Turismo ensures that adequate assurance is given to protect the personal data in accordance with the applicable data protection law and that corresponding agreements have been concluded with each of the external suppliers.

Passo Turismo's servers are located in The Federal Republic of Germany and run by a German host provider.

4.2 Social media plug-ins

Functions from various third-party providers of social media platforms (such as Facebook, Twitter, Google+) are integrated into the Passo Turismo platform. Plug-ins enable users to share content on social networks.

If a plug-in is displayed when browsing the Passo Turismo platform (e.g. Facebook's "Like" button), a connection with the relevant third-party provider's servers is automatically established. This means that data on customers' and users' visit to the website can be transmitted to these third-party providers. If the customer or user is also registered with this third-party provider's network, the visit to the website may also be assigned to their network account (e.g. Facebook account).

Passo Turismo has no control over the method of this type of data transmission. The purpose and scope of the data collection and the subsequent processing and use of the data by the relevant social media providers as well as the related rights and configuration options for privacy protection can be found in the privacy notices of the relevant third-party providers.

5. Data Security

Passo Turismo does not pass its customers' data on to third parties under any circumstances, except for to the external service providers in accordance with Section 4, and solely uses their data for the purposes stated in Section 3. Passo Turismo also uses state-of-the-art technology to take the usual steps to protect the data. However, Passo Turismo provides no guarantee for the security of customer data. It is the customer's responsibility to produce an up-to-date backup of the data transmitted and to save it off the platform. It is also the customer's responsibility to set a secure password for their customer account, to keep this safe and to change it regularly.

6. Customers' And Users' Rights

Passo Turismo's customers and users have the right to have their data amended or erased. This is subject to statutory retention requirements. They can restrict the processing of their personal data in addition to this. To assert these rights, Passo Turismo's customers and users should contact the following address: [\[privacy@passo-tourismo.com\]](mailto:privacy@passo-tourismo.com).

Customers and/or users have the right to object to the processing of their personal data at any time. If they object to this, the contract between Passo Turismo and the customer or user will be terminated without notice. Payment obligations that the customer is contractually bound to will remain unaffected.

If Passo Turismo fails to observe the applicable data protection law, customers and users have the right to make a complaint to the competent supervisory authority.

7. Storage Of Customer And User Data

Passo Turismo stores the personal data it has collected from customers and users for as long as necessary to fulfil its contractual and legal obligations and to meet the purposes stated in Section 3. Passo Turismo's legal retention obligations will remain.

8. Contact

Questions regarding Passo Turismo's data processing practices can be sent to the following address:

Passo Turismo GmbH

Elsässer Strasse 32

81667 München

Federal Republic of Germany

Tel.: +49-89-44454512

Email: info@passo-tourismo.com