

Information provided in accordance with Articles 13 and 14 of EU Regulation 2016/679 and the relevant national data protection laws

General information

HeyLight is a trademark owned by Compass Banca S.p.A. and licensed for use to HOLIPAY S.R.L., a company incorporated under Italian law with VAT number 16090851003 and with its registered office in Viale Ortigara, 7/9 Milano Marittima, Italy, which operates in the tourism market offering innovative IT solutions to operators in the hospitality industry (hereinafter the "**Company**" or "**Holipay**") and provides this privacy policy (hereinafter the "**Privacy Policy**") because of the data provided by the user (hereinafter the "**Data Subject**") which will be processed by Holipay as Data Controller (the "**Data Controller**"), in accordance with EU Regulation 2016/679 (hereinafter, the "**Regulation** or **GDPR**") and the national legislation in force on the protection of personal data, for the use of the service of splitting deposits due to accommodation facilities affiliated with Holipay and those related to it governed by the appropriate terms of service also accessible through the website www.holipay.com (hereinafter the "**Website**"). The personal data held by Holipay are usually collected directly from the Data Subject or may come from third parties.

1. Data Protection Officer

Holipay has appointed the "data protection officer" required by the Regulation (so-called "**DPO**"). For all matters relating to the processing of your personal data and/or to exercise the rights provided for by the Regulation itself, you may contact the DPO at the following email addresses: info@holipay.com

2. Purpose of the processing

Personal data are processed by Holipay for the following purposes:

- fulfilment of obligations under the law, regulations and EU legislation. Performance of activities necessary and strictly connected and instrumental to the management and/or performance of services at the request of the Data Subject. Please note that the provision of personal data for the above-mentioned purposes is mandatory and does not require the consent of the data subject. Failure to provide data for these purposes may make it impossible to follow up on the data subject's request and render the data subject's right deriving from the request to join the services neither exercisable nor guaranteed. For the pursuit of the aforesaid purposes, personal data may be communicated to companies belonging to the Mediobanca Group and acquired by them, always and only in accordance with the principle of essentiality and minimality of the processing (Decision by the Italian Data Protection Authority No. 192 of May 2013);
- market research, commercial and promotional activities relating to Holipay's products and services, as well as by companies belonging to the Mediobanca Group. Business and promotional communications may be conveyed through traditional means (paper mail) and also through the use of remote communication techniques, such as telephone, even without an operator, e-mail, MMSs, computer applications (APP), reserved area, SMSs, other messaging services, RCS "Rich Communication Services", fax, search engines, websites, web platforms, or through social networks. Computer tools are also used to verify the consistency of the products on offer. Providing data for this purpose is optional and processing requires the consent of the data subject. In the event of a refusal, there will be no consequences for any existing requests and relationships of the data subject;
- activities related to the monitoring of the progress of the relationship established by the user with Holipay and the accommodation facilities affiliated with Holipay, including data deriving from payment flows managed through the payment service provider, on the payment instruments provided by the user. Authorisation to process data for this purpose, including transfer to companies belonging to the Mediobanca Group, is optional and the processing requires the consent of the data subject. In the event of a refusal, there will be no consequences for any existing requests and relationships of the data subject.

3. Legal basis for the processing

The legal basis consists of the following:

- for the processing referred to in point a), the legal obligation and the performance of relations established at the request of the data subject;
- for the processing referred to in points b), c), the explicit consent.

Where processing is necessary for the pursuit of the legitimate interests of Holipay or third parties, it may be carried out provided that the interests or fundamental rights and freedoms of the Data Subject do not prevail.

4. Categories of personal data and source of data

Holipay processes personal data freely provided by the Data Subject or collected from third parties such as, but not limited to:

- identification data (e.g. first name, surname, residential address, date of birth, nationality, tax code, sex, telephone, Internet Protocol ('IP') address);
- data relating to or traceable to the payment instrument;
- data relating to the progress of the relationship and payments managed through the payment service provider;

5. Methods of processing personal data

The processing of personal data, which may also be collected through specific declarations, *online* formats or questionnaires, takes place through manual, computerised and telematic tools and consists of electronic processing, consultation, comparison with pre-established criteria, transmission and communication, with the exclusion of dissemination, of data to the third parties indicated below and in any other appropriate operation relating to the achievement of the aforementioned purposes, also through

continuous processing.

Furthermore, personal data processed automatically may be the basis for checks and decisions for access to the requested services, including through access to databases. Such processes where used are mandatory for the execution of the contract. The criteria adopted for these assessments take into account the personal data provided, those that may be in the possession of Holipay and those collected through third parties. The Data Controller acknowledges having adopted suitable procedures and measures related to automated processing to guarantee and protect the Data Subject who may exercise his or her rights by written communication to be sent to: info@holipay.com.

6. Persons to whom personal data may be disclosed

Any information provided to third parties shall be based on the principles of fairness, lawfulness, transparency and protection of the rights of the data subject and related specific purposes as well as the individual legal bases already indicated.

Personal data may be disclosed by Holipay to the following persons, including foreign ones, which will process them as independent data controllers or data processors:

- as for legal obligations, regulations and EU legislation, or for activities connected with and instrumental to the performance of contractual obligations: to persons that provide business information; companies that provide payment services and/or carry out account information and/or account disposition services; companies that manage international payment service circuits; private and public entities from which the data may be known (including for fraud prevention purposes); suppliers of goods and services; companies of the Mediobanca Group;
- as for commercial and promotional activities relating to the products and services of Holipay, of Companies belonging to the Mediobanca Group, of third party companies, if you have expressed your specific consent also for the purpose of identifying the products and services to be promoted; companies carrying out commercial and promotional activities for marketing purposes; advertising agencies.

Please note that the Website may contain links to other websites, which are not governed by this Privacy Policy.

7. Persons in charge and authorised processors

For the processing of data, Holipay avails itself of employees and collaborators authorised for data processing.

They operate under the operational and management control of the Data Controller itself, with whom they have direct contact in order to take directives in relation to internal procedures and concrete cases of protection of the confidentiality of personal data that arise. Otherwise, for other activities requiring external services, Holipay makes use of third parties designated as data processors.

8. Data Retention

In accordance with the principles of proportionality and necessity, personal data will be stored in a form that allows the identification of the data subjects for a period of time not exceeding the achievement of the purposes for which the data are processed, in compliance with the principles of sound and prudent management, i.e. taking into account the need to continue to store the personal data collected in order to offer the services agreed with the user or to protect the legitimate interest of the Data Controller, as described in the purposes above.

In any case, the statutory retention periods for all the processing purposes indicated will be adhered to, unless there are reasons for interruption (e.g. a lawsuit or a pending complaint) and unless the applicable law *at that time* dictates otherwise.

9. Transfer of personal data outside the EU

Personal data, in accordance with the above and for the purposes indicated, may be transferred to non-EU countries. In this case, the Data Controller hereby ensures that the transfer of data outside the EU will be regulated in accordance with the provisions of Chapter V of the Regulation and authorised on the basis of specific decisions of the European Union. Accordingly, all necessary precautionary measures will be implemented to ensure the highest level of protection of the data transferred, predicated upon: a) adequacy decisions of the receiving third countries made by the European Commission; b) adequate safeguards offered by the receiving third party pursuant to Article 46 of the Regulation; c) the adoption of binding corporate rules.

10. Rights of the data subject

Data subjects have the right at any time to request from Holipay confirmation of the existence, processing, content, origin, and accuracy of their personal data, as well as to request integration, updating, or rectification if necessary, in accordance with Articles 15 and 16 of the Regulation, through access to them.

They may request the deletion, restriction of processing, withdraw consent, request data portability, lodge a complaint with the supervisory authority and object to their processing on legitimate grounds in any case (under Art. 17 et seq. of the Regulation). The Controller shall, through designated facilities, handle the request and provide information about the action taken regarding the request without undue delay, and at the latest, within one month after receiving the request.

The data subject may at any time exercise their rights by sending a written communication to: info@holipay.com, or by sending a registered letter with acknowledgment of receipt to Holipay S.r.l., with its registered office at Viale Ortigara, 7/9 Milano Marittima.

Holipay endeavours to take appropriate measures to rectify or erase any inaccurate personal data.