

Adventures in Northern Italy (AINI LLC) Privacy Policy

We treat the personal data of our customers in great consideration, meeting the recent new requirements of applicable data protection legislation (GDPR). When we talk about "personal data" in this policy, we mean any information which could be used to identify you, either directly or indirectly.

This privacy policy explains in detail the types of personal data that we may collect and process about you when you visit our website, including any data you may provide through this website. It also explains how we will store and handle that data, when and why we share your data with third-party service providers, and how the law protects you.

It is important that you read this privacy notice so that you are fully aware of how and why we are using your data. If you have any questions, comments, concerns or complaints about any aspect of this privacy policy, please contact us at any time at info@adventuresinnorthernitaly.com or call us on +39 328 6978083. If you remain unhappy with a response you receive from us you can also refer to the Italian Data Protection Authority according to the Law to which the Controller AINI LLC is subject. For more information – see <https://edps.europa.eu>

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Controller

AINI LLC (which includes Adventures in Northern Italy) is the controller and responsible for your personal data (collectively referred to as 'we', 'us' and 'our' in this privacy policy). Our full details are: Full name of legal entity: AINI LLC; Postal address: 11 Stone Hill, Bloomfield CT 06002 USA; Email address: info@adventuresinnorthernitaly.com

Changes

From time to time we may make changes to this privacy policy. If we decide to do so we will post the changes on our Website so that you are always aware of what personal data we collect about you, and how we use it. If we need to, we will e-mail you with details of those changes and/or ask you to confirm that you are happy with them.

Although this privacy policy sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests until after that date as we are still working towards getting our systems ready for some of these changes.

What personal data do we collect and when?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will collect and use the following categories of personal data about you:

(1) **Personal data you share with us.** When you order from us on the Website, when you register for a Adventures in Northern Italy (AINI LLC) account, when you sign up to our mailing lists (e.g. news), or when you complete one of our customer feedback surveys or enter a competition, we may ask for (one or more of) your name, title, gender, date of birth, email address, delivery address, telephone number.

(2) **Personal data we collect about you.** We collect some personal data, as well as other information in the form of anonymous or aggregate statistics, when you use our Website. We may collect: IP address; MAC address; other browser-generated information, e.g. browser type, operating system, date and time of access, how long a person looks at a website, what they look at etc; and location information. We collect some of this information using cookies. You can find more information on what cookies we use, how we use them, and your options for changing how we use them in the section below on "Cookies" and in our Cookies Policy. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

(3) **Personal data we receive from other sources.** When you interact with us, or use any of our pages on social media sites, such as Facebook, Instagram etc., we may collect information about you which could include personal data, for example, when you "Like" a post on our Facebook page. Those social media sites will also have their own privacy policies explaining how they use and share your personal data. You should carefully review those privacy policies before you use social media sites, to make sure that you are happy with them.

We collect personal data when you: purchase products at our online shop; subscribe to our email newsletters; contact us with an enquiry or comment.

Why we collect your personal data?

(1) Personal data you share with us

We use the personal data you share with us in order to perform our obligations under any contract we have with you, and specifically to: - provide you with our products and to fulfill orders that you place with us on our Website; - create and help you manage your Adventures in Northern Italy (AINI LLC) account; - allow you to return your product, if you change your mind; - respond to your questions and requests; and - send you information on any changes we make to our policies or terms. Where you have given us your consent to contact you, we will use your personal data to: - send you newsletters, marketing communications, products update - contact

you to invite you to special events; - send you an invite to our sample sale if you have subscribed to it; You can withdraw your consent at any time.

(2) Personal data we collect about you

We use the personal data we collect about you for our legitimate interests so that we can: - tailor the way that you interact with us in the future, such as tailoring certain emails and also show you certain adverts, products or offers in which we think you may be interested on our Website and on certain third party websites (including on social media); - analyse how our Website is used, so that we can constantly improve the services that we offer; - analyse your feedback, and understand your expectations on our products or services to optimize your customer experience; Not all of the information used for these purposes is "personal data"; some of it is anonymous or used on an aggregate basis.

(3) Personal data we receive from other sources

We use the personal data we receive from other sources for our legitimate interests so that we can develop an understanding of what people think about our products and services, so that we can constantly improve them.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services).

How we use your personal data?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data. Where we rely on consent, you have the right to withdraw consent to marketing at any time by contacting us.

The following list provides general detail about the types of data we process, why we process it, and the lawful basis upon which we do so:

To register you as a new customer

Types of data	Lawful basis
Identity, Contact	Performance of a contract with you

To process and deliver your order or subscription

Types of data	Lawful basis
Identity, Contact, Financial, Transaction,	a) Performance of a contract with you, (b)

Marketing and Communications

Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which may include notifying you about changes to our terms or privacy policy, or updating you about the status of your subscription

Types of data

a) Identity, b) Contact, c) Profile, d) Marketing and Communications

Lawful basis

a) Performance of a contract with you, b) Necessary to comply with a legal obligation, c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

To enable you to partake in a prize draw, competition or complete a survey

Types of data

a) Identity, b) Contact, c) Profile, d) Usage, e) Marketing and Communications

Lawful basis

a) Performance of a contract with you, b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

Types of data

a) Identity, b) Contact, c) Technical

Lawful basis

a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization), b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

Types of data

a) Identity, b) Contact, c) Profile, d) Usage, e) Marketing and Communications, f) Technical

Lawful basis

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

Types of data

Lawful basis

a) Technical, b) Usage

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you

Types of data

a) Identity, b) Contact, c) Technical, d) Usage, e) Profile

Lawful basis

Necessary for our legitimate interests (to develop our products/services and grow our business)

Who will process and who do we share your personal data with?

Your personal data will be processed by the internal staff of Adventures in Northern Italy (AINI LLC) who have been specifically trained and authorized for this processing. Your personal data will also be transmitted to third parties that we use to provide our services; these parties have been rigorously assessed and offer a guarantee of compliance with the legislation on the processing of personal data according to the instructions given by and under our control.

- service providers who help us to operate our website, fulfill your orders and deliver our products to you; for example, order packers, couriers, payment providers, IT support and so on;
- marketing agencies to help us develop and improve your customer experience. We provide these companies with only the information they need to perform their services and work closely with them to ensure that your privacy is respected and protected. These companies are prohibited by contract from using this information for their own marketing purposes or from disclosing or sharing this information with anyone other than Adventures in Northern Italy (AINI LLC);
- certain regulatory bodies, government and enforcement agencies, if we need to do so or are requested to do so.

We will also share personal data collected about you with social media channels, advertising networks and other third parties who help us to understand how our Website are being used, how well our advertising works and how we can improve; to provide ad measurement services and to target advertising (and in some cases, we may allow those third parties to collect and receive data themselves for these purposes, which they may also collect from elsewhere on the internet and other apps). This information is collected using cookies and other similar technologies. You can find more information on what cookies and technologies are used, how they are used, and your options for changing how we use them in the section below on "Cookies" and in our Cookies Policy.

To deliver products and services to you, it is sometimes necessary for us to share your data outside of the European Economic Area. This will typically occur when service providers are located outside the EEA or if you are based outside the EEA. These transfers are subject to special rules under data protection laws. If this happens, we will ensure that the transfer will be compliant with data protection law and all personal data will be secure. Our standard practice is to use 'standard data protection clauses' which have been approved by the European Commission for such transfers.

Marketing: receiving contact from Adventures in Northern Italy (AINI LLC) and changing contact preferences

Where you have consented, we will also send you e-mails with information in relation to any products which we think you might like. This is how we decide which products, services, newsletters and offers may be relevant for you (we call this marketing). You will receive marketing communications (including newsletters) from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion, or you have consented to receive marketing communications from us and, in each case, you agreed that we can (sometimes referred to as an "opt-in").

You can ask us to stop sending you marketing messages or adjust your marketing preferences at any time by logging into your online account and checking or unchecking relevant boxes, or by clicking the "unsubscribe" link in any communication that we send to you by email. Please also note that while your request is being processed, for a brief period you may continue to receive communications which are already on their way to you. You may also unsubscribe by contacting us on info@adventuresinnorthernitaly.com, or by calling us on +39 328 6978083

Third-party marketing

We will not disclose, rent, sell, share or otherwise transfer your personal data with third parties for marketing purposes.

Third party sites/links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies or use of your personal data. When you leave our website, we encourage you to read the privacy notice of every website you visit.

How we protect your personal data

We care about your personal data and know that you trust us to keep it secure. We will take reasonable care to maintain appropriate safeguards to ensure the security, integrity and privacy of the information you have provided to us. We have put in place technology and security policies which are designed to protect the personal information we hold about you and review those regularly. For our website that process payment, or have password-protected areas, we use HTTPS - your web browser should indicate that such pages are secure. Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website. You are responsible for keeping this password confidential. We ask you not to share your password with anyone. Your personal data is stored securely on databases and servers. These databases and servers are maintained either by us or by our third-party service providers.

How long do we keep your personal data

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

We will not retain your personal data for longer than is necessary to fulfill the purposes for which you provided that personal data, unless the law permits or requires that we retain it for longer. The retention period varies depending on the purpose of the processing. For example, the data collected during your purchase of goods on www.adventuresinnorthernitaly.com are retained in accordance with local tax law (10 years in Italy), while those data used to send you our marketing communications are retained until you ask to be unsubscribed.

Cookies

Our Website uses cookies to collect information about you, including some personal data. "Cookies" are small data files which are placed on your device via your web browser when you visit the Website. Any personal data collected by those cookies will be used in accordance with this privacy policy. You can find more information on what cookies we use, how we use them, and your options for changing how we use them in our Cookies Policy.

Your legal rights

You have the right to: Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. You can amend personal data we hold about you via your account on the website. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to

provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us. To ensure that the data of our users are not subject to breaches or illegitimate use by third parties, we will ask you to confirm your identity before carrying out your request.

How to contact us

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint, please contact info@adventuresinnorthernitaly.com We aim to respond to all queries within 48 hours.

This privacy policy was last updated in December 2018. Please check back regularly to keep informed of updates to this privacy policy.