

Data Privacy Notice

This Data Privacy Notice explains how we, Portofino Connection LLC (**Portofino Connection**), collect and use any personal information about you and other persons we provide Services to (**Personal Data**). We may collect Personal Data when you acquire services, products or goods from us (the **Services**), use this website, when you correspond with us, complete surveys, provide feedback and participate in competitions.

For any question please contact us under info@portofinoconnection.com.

1. Types of Personal Data collected

In the course of providing Services, we may process Personal Data:

a) Information we may collect including without limitation:

- Personal contact details such as name, title, addresses, telephone numbers and personal email addresses, date of birth and place of birth, gender, marital status, dependents (name and age) and relations;
- Copies of identification documents, nationality and country of residence, payment information (including but not limited to credit card information and billing addresses);
- Special category Personal Data, which may include political opinions, affiliations, health information racial or ethnic origin and religious or philosophical beliefs;
- Information regarding your preferences, past experiences, booking history or any other information we deem useful when providing or offering Services.

b) Information regarding other persons

In relation to the Services, you may share with us with information about other persons. Before sharing such information, you shall provide a copy of this notice to those persons and acquire, to the extent necessary, their prior consent for the relevant transfer of their data to us and the processing of their data by us.

c) Sources of Personal Data we collect: directly from you or from any third-party, as Portofino Connection deems appropriate in its own and absolute discretion, or when information is created as a result of generally providing Services to you.

2. How we use Personal Data

a) Most commonly, we will use Personal Data in the following non-exhaustive circumstances:

- Where we need to perform any contract we are about to enter into or have entered into with you, or provide Services or where we send you offers or promotions, brochures, leaflets, newsletters or inspirations.
- 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 and where we need to comply with a legal, business or regulatory obligation.

b) We do not rely upon consent as a legal basis for processing Personal Data. We have set out below the ways in which we use Personal Data, however please note that we may process Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data:

- To manage your bookings and providing or offering any kind of Services
- To contact you with information and detail about the requested Services
- To personalize your customer experience
- To improve our Services
- To send you marketing material
- To ensure security and protect business interests

- To use data analytics
 - To comply with legal obligations
- c) We sometimes collect your information so that we can form a view on what we think you may want or need, or what may be of interest to you. With this information we decide which products, services and others may be relevant for you and what offers you may be interested in. We may keep you up-to-date with our latest Services, partnerships, sales, promotions, competitions, goods, etc. that we think might be of interest and relevance to you.

3. Sharing your Personal Data

In order to provide Services to you, we may have to share your Personal Data with the parties set out below:

- Third-party suppliers we work with including without limitation, airlines, tour operators, transport companies, excursion providers, airport authorities, insurance companies, hotels, companies, car hire, event venues, shops, sellers etc.
- Other suppliers we work with in connection with our business, including without limitation marketing agencies, IT developers, services providers, software companies and credit card screening companies, credit references and fraud prevention agencies, professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

The recipients mentioned above, may be located outside of Switzerland and the European Economic Area.

4. Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. This information is used to track visitor use of the website and to compile statistical reports on website activity.

For further information visit www.aboutcookies.org or www.allaboutcookies.org.

You can set your browser not to accept cookies and the above websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result.

5. Other websites

Our website may contain links to other websites or resources. This Data Privacy Notice only applies to this website so when you link to other websites you should read their own privacy policies. Portofino Connection is not responsible for any third-party content on third-party websites.

6. Changes to our Data Privacy Notice

We reserve the right to update this Data Privacy Notice at any time and without prior notice and we will place any updates on this website. This Data Privacy Notice was last updated on April 2020.

7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data:

- **Access:** we will confirm to you whether or not we are processing and using Personal Data, at your request and, if so, provide you with access to and a copy of such Personal Data and the other details to which you are entitled.
- **Ratification:** we will correct any inaccurate Personal Data and complete any incomplete Personal Data (including by providing a supplementary statement) that we hold about you.
- **Prevention of processing likely to cause damage or distress:** we will respect your rights to require us to cease or not to begin processing your Personal Data for a specific purpose, or in a specific way, that is likely to cause you or any third parties unwarranted damage or distress.

- **Erasure:** we will erase your Personal Data at your request where there is no good reason for us to continue to use it.
- **Restriction:** we will restrict the processing of Personal Data in certain circumstances, if you ask us to do so.
- **Data portability:** we will provide you or third parties on your behalf with a copy of any Personal Data that we hold about you which you have provided to us in a structured format.
- **Objections:** we will respect your general rights to object to the processing of Personal Data in certain circumstances, including opting out of direct marketing.

If you wish to exercise any of the rights set out above, please contact us.

8. Providing your Personal Data

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 Services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.