

# Privacy Policy of Muovendo.com

[www.muovendo.com](http://www.muovendo.com) e subdomains

Here in after generally referred to as "the sites" and "the domains".

Our websites collect some Personal Data from their Users.

## Summary of the policy

Personal Data is processed for the following purposes and using the following services: Wordpress form for newsletter registration and remarketing purposes. Management software for uploading journeys and travel proposals.

Personal Data: surname; purchase history; e-mail; address of billing; payment information; first name;

## contact info

The Data Controller is –  
Black Car Ibiza S.L.  
CL BISBE ABAD AND LASIERRA 35  
07800 EVISSA  
BALEARES  
Owner's email address: [info@Muovendo.com](mailto:info@Muovendo.com)

## full policy

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## Types of Data collected

Among the Personal Data collected by muovendo.com and group domains, independently or through third parties, there are: contact information; first name; surname; telephone; e-mail; address; purchase history;

## Tracking Tool.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

Personal Data may be freely provided by the User or, in case of Usage Data, collected automatically when using muovendo.com and group domains. Unless otherwise specified, all the Data requested by muovendo.com and domains of the group are optional. If the User refuses to communicate them, it may be impossible for muovendo.com and domains of the group to provide the Service.

In cases where the site indicates some Data as mandatory, Users are not free to refrain from communicating such Data, under penalty of consequence on the availability of the

Service or on its operation. Users who have doubts about which Data are mandatory are encouraged to contact the Owner.

Any use of Cookies - or other tracking tools - by muovendo.com and group domains or owners of third-party services used by the site, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to the additional purposes described in this document and in the Cookie Policy. The User assumes responsibility for the Personal Data of third parties obtained, published or shared through muovendo.com and group domains and guarantees to have the right to communicate them spread them, freeing the Owner from any liability towards third parties.

## **Method and place of processing of the collected Data**

### *Methods of treatment*

The Data Controller adopts the appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization of muovendo.com and group domains (administrative, commercial, marketing, legal, system administrators) or external subjects (such as technical service providers) may have access to the Data. third parties, postal couriers, hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller.

The updated list of Managers can always be requested from the Data Controller.

### *Legal basis of the treatment*

The Data Controller processes Personal Data relating to the User in the event that one of the following conditions exists:

- the User has given consent for one or more specific purposes;

Note: in some jurisdictions, the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such treatment.

However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data;

- the processing is necessary for the execution of a contract with the User and/or for the execution of pre-contractual measures;
- the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;
- the treatment is necessary for the execution of a task of public interest the exercise of public powers with which the Data Controller is vested;
- the processing is necessary for the pursuit of the legitimate interest of the Data Controller or of third parties. However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

### *Place*

The Data is processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, contact the

Owner. The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of processing, the User can refer to the section relating to the details on the processing of Personal Data. The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization governed by public international law or constituted by two or more countries, such as for example the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data. The User can verify whether one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the indicated addresses at the opening.

#### *Storage period*

The Data are processed and stored for the time required by the purposes for which they were collected. Therefore:

- Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.
- Personal Data collected for purposes attributable to the legitimate interest of the Data Controller will be retained until such interest is satisfied. The User can obtain further information regarding the legitimate interest pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

When the treatment is based on the User's consent, the Owner can keep the Personal Data for longer until said consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, upon expiry of this term, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

#### *Purpose of the processing of the collected data*

The User's Data is collected to allow the Owner to provide the Service, fulfill legal obligations, respond to requests or executive actions, protect its rights and interests (or those of Users or third parties), identify any malicious activity or fraudulent, as well as for the following purposes.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

#### *Details on the processing of Personal Data*

Personal Data is collected for the following purposes and using the following services: • WORDPRESS and TRAVEL REQUESTS AND PROPOSALS SOFTWARE. Unless otherwise specified, muovendo.com and group domains process all services with technologies based on high digital security standards. In general, and unless otherwise indicated, Users are requested to provide payment details and personal information directly through the interfaces of use on the sites and apps.

#### *User Rights*

Users can exercise certain rights with reference to the Data processed by the Owner. In particular, the User has the right to:

- revoke consent at any time. The User can revoke the previously expressed consent to the processing of his Personal Data.
- oppose the processing of their Data. The User can object to the processing of their Data when it occurs on a legal basis other than consent. Further details on the right to object are set out in the section below.
- access their Data. The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.
- check and ask for rectification. The User can verify the correctness of his Data and request its updating or correction.
- obtain the limitation of the treatment. When certain conditions are met, the User can request the limitation of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose than their conservation.
- obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User can request the cancellation of their Data by the Owner.
- receive their data or have them transferred to another holder. The User has the right to receive their Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain its transfer without obstacles to another holder. This provision is applicable when the Data are processed with automated tools and the processing is based on the User's consent, on a contract of which the User is a party or on contractual measures connected to it.
- propose a complaint. The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

#### *Details on the right to object*

When Personal Data is processed in the public interest, in the exercise of public powers vested in the Data Controller or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing for reasons connected with their particular situation.

Users are reminded that, should their Data be processed for direct marketing purposes, they may object to the processing without providing any reason. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

#### *How to exercise your rights*

To exercise the User's rights, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within a month.

### **Learn more about treatment**

#### *Defense in court*

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuses in the use of muovendo.com and group domains or connected Services by the User.

The User declares to be aware that the Owner may be obliged to disclose the Data by order of the public authorities.

### *Specific information*

At the request of the User, in addition to the information contained in this privacy policy, muovendo.com and group domains could provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

### *System and maintenance logs*

For needs related to operation and maintenance, muovendo.com and domains of the group and the any third-party services used by it may collect system logs, i.e. files that record interactions and which may also contain Personal Data, such as the User's IP address.

### *Information not contained in this policy*

Further information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details. Responding to "Do Not Track" Requests muovendo.com and group domains does not support "Do Not Track" requests.

To find out if any third-party services used the support, the User is invited to consult the respective privacy policies.

### *Changes to this privacy policy*

The Data Controller reserves the right to make changes to this privacy policy at any time notifying to Users on this page and, if possible, on muovendo.com and group domains as well as, if technically and legally feasible, by sending a notification to Users through one of the contact details in its possession. Therefore, please consult this page frequently, referring to the date of the last modification indicated at the bottom. If the changes concern treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

### *Definitions and legal references*

#### *Personal Data (or Data)*

Personal data is any information which, directly or indirectly, also in connection with any other information, including a personal identification number, makes a natural person identified or identifiable.

#### *Usage Data*

This is the information collected automatically through muovendo.com and group domains (also from third-party applications integrated into muovendo.com and group domains), including: the IP addresses or domain names of the computers used by the user who connects with muovendo.com and domains of the group, the addresses in URI (Uniform Resource Identifier) notation, the time of the request, the method used to forward the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details relating to the itinerary followed within the Application, with particular reference to sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

### *User*

The individual who uses muovendo.com and domains of the group which, unless otherwise specified, coincides with the interested party.

### *Interested*

The natural person to whom the Personal Data refer.

### *Data Processor (or Manager)*

The natural person, legal person, public administration and any other body that processes personal data on behalf of the Data Controller, according to what is set out in this privacy policy.

### *Data Controller (or Owner)*

The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of processing personal data and the tools adopted, including the security measures relating to the functioning and use of muovendo.com and domains of the group. The Data Controller, unless otherwise specified, is the owner of muovendo.com and domains of the group.

muovendo.com and domains of the group (or this Application)

The hardware or software tool through which the Personal Data of Users are collected and processed.

### *Service*

The service provided by muovendo.com and group domains as described in the relative terms (if available) and on this site/application.

### *European Union (or EU)*

Unless otherwise specified, any reference to the European Union contained in this document is intended to extend to all current member states of the European Union and the European Economic Area.

### *Cookie*

Cookies are Tracking Tools that consist of small portions of data stored in the User's browser.

### *Tracking Tool*

Tracker means any technology - e.g. Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - which allows tracking Users, for example by collecting or saving information on the User's device. Legal references

This privacy statement has been prepared on the basis of multiple legislative systems, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement only concerns muovendo.com and group domains.

ROME APRIL 2023