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## Privacy Notice

### DISCLOSURE PURSUANT TO ART. 13-14 GDPR (GENERAL DATA PROTECTION REGULATION)

2016/679 According to the legislation indicated, this treatment will be based on the principles of correctness, lawfulness, transparency and protection of your privacy and your rights. This privacy statement ("Notice") is provided in order to illustrate the methods, purposes and timing of collection and use of your personal data. With the information we also communicate your rights and how to exercise them.

UPDATES: The Information will be constantly updated, due to the changes that the activity may undergo over time, also following the satisfaction needs of our customers, due to a more continuous and careful analysis of your rights and legal protections to be adopted. We therefore invite you to carefully read this Policy and to review it regularly to be always aware and updated. Pursuant to article 13 of the GDPR 2016/679, therefore, we provide you with the following information:

PERSONAL DATA HOLDER: Magicland S.p.a. (the Company), with registered office in Valmontone, Via della Pace snc and operational headquarters in Valmontone (RM), via della Pace snc, where the "Magicland" amusement park is located, is the owner of the processing of your personal data. For more information on the structure and activities of our company, please consult the other sections of our website [www.magicland.it](http://www.magicland.it). There are also co-owners of the processing of personal data whose role derives from contractual relations with the company necessary for the supply and implementation of the activities covered by the company.

DECLARATION OF PURPOSES: Your personal data (provided to us by you, by third parties or coming, within the limits of the law, from public lists) can be processed for the following purposes expressly declared: 1. to fulfill a legal obligation or regulation; 2. fulfill a contractual or non-contractual obligation; 3. for direct commercial purposes (to offer services or goods to the interested party); 4. perform profiling; 5. for indirect commercial purposes with transfer of data to third parties; 6. for post-commercial purposes; 7. send periodic communications. In particular, we consider it useful to clarify the meaning of the types of purposes listed below:

1. Law or regulation: that is, to fulfill obligations established by law, by a regulation, by European Union legislation as well as by provisions issued by Authorities legitimated by the law or by competent Supervisory or control bodies (in this case the Your consent is not necessary as the data processing is related to compliance with these obligations / provisions). The data processed by law include those relating to tax regulations or anti-money laundering registers, services that are compulsorily provided at the Park upon indication of the competent authorities.

2. Contractual or non-contractual and, more generally, administrative-accounting obligations, that is, to perform obligations deriving from the contracts of which you are a part or to fulfill, before the conclusion of the contract, your specific requests, also through remote communication techniques, including a dedicated telephone call center (in this case your consent is not necessary, since the data processing is functional to the management of the relationship or the execution of requests); these treatments also include the purpose deriving from the protection of mutual interests in court and for tax purposes or for other legal obligations such as, for example, the anti-money laundering register if applicable. Among the data processed for contractual purposes we mention those provided or collected in compliance with the provisions of the Park Regulation (we invite you to consult it at the Park or on the website [www.magicland.it](http://www.magicland.it)), which represents the contractual relationship established between the user and the Company from the moment of entry to the Park; those provided on the occasion of the purchase of a service or a performance, for the satisfactory execution of the same.

3. Direct commercial: that is, to provide you with information and send you informative, commercial and advertising material (also through remote communication techniques such as, by way of example: postal correspondence, telephone calls also through automated call systems, fax, e-mail, SMS messages or MMS or other) on products, services or initiatives of the Company, to promote them and to carry out direct sales actions. (In this case, your consent is optional and does not affect the maintenance of relations with the Company). Profiling: to carry out market research, to verify the quality of the products or services offered to you (also through telephone calls or sending questionnaires), to optimize the offer (also through focused and selected analyzes), to carry out commercial communications, to perform statistical research, to apply one or more profiles (for the purpose of making appropriate commercial decisions or to analyze or predict, again for commercial purposes, your personal preferences, your behavior and your attitudes). (In this case, your consent is optional and does not affect the maintenance of relations with the Company).

5. Indirect commercial: i.e. by communicating your data to third parties to third parties so that they carry out their own independent commercial activities as indicated in the previous number 3. (In this case, your consent is optional and does not affect the maintenance of relations with the Company).

[Communication of data to third parties (through Transactionale.com)] The Data Controller may create databases using all or some of the User's Data and / or using second level data derived from the statistical

processing of the Data provided or from the creation of profiles of Users. If the User makes a purchase and gives consent, the Data Controller may communicate the Data indicated in the previous paragraph to third parties with respect to whose products the User has expressed interest. Third parties may use the data received to send commercial and promotional emails. The User will always have the possibility to withdraw his consent by simply sending an email to the contact information contained in this document or, if the communication has already taken place, directly to the component of the "Transactionale" network that received the Data.

6. Post-commercial: that is, in order to investigate, after the termination or revocation of relations with the Company, the reasons for the interruption of relations. (In this case, your consent is optional and does not affect the maintenance of relations with the Company).

7. Send periodic communications: that is, in order to send communications on the Park's news, events, shows, etc. (In this case, your consent is optional and does not affect the maintenance of relations with the Company).

#### WHAT DATA ARE COLLECTED:

Data provided directly by you:

- registration on our website;
- subscription of services offered at the Park or through the website;
- newsletter registration;
- purchase of passes, tickets;
- access a service present in the Park that requires the communication of data for the completion of the same (by way of example: reception services, infirmary, lost property);
- completion of questionnaires;
- video surveillance for compliance with safety regulations, obligations imposed by the competent authorities;
- telephone reservations;
- email or telephone contacts for information, clarifications, advice, requests, complaints etc.
- release of data for the purpose of receiving information, discounts or commercial communications from our Partners;
- during events in order to be able to collect images;
- images for sale purposes, through the photo points, whose discipline is declined within the Park Regulations.

Data provided by intermediaries commissioned by you:

- When booking or purchasing the services sold;
- telephone reservations; Information on the user, on family members can be provided indirectly by a family member or by a third person when making a ticket or subscription purchase or participating in particular activities.

Special cases of data:

- "Particular" data also known as "sensitive", i.e. personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data intended to uniquely identify a natural person, data relating to the health or sexual life or sexual orientation of the person (art.9 of the GDPR regulation) or relating to criminal convictions and crimes or related security measures (art 10 of the GDPR regulation). These data can be processed only with your explicit written consent if there is one of the reasons indicated in article 9 paragraph 2 and art. 10 of the regulation. Consent is free and optional but the refusal to consent could prejudice the performance of one or more activities you requested from the Company which specifically concerns facts for which it is essential to process this type of data.
- Since the data you provide can consist of so-called 'biometric' data, such as fingerprints, hand, face or signature collected using technological tools, the same will be processed in accordance with the provisions of the law in force with your consent where necessary and for the purposes indicated in this treatment form.
- Data of minors under the age of 18 and over the age of 16 will be treated with particular attention to confidentiality and within the limited time frame necessary for the fulfillment of the services requested, excluding purposes other than those underlying the existing relationship.

Consent to the processing of your data may be binding in order to conclude contracts with the Company or with third parties. Only data whose processing is essential in order to be able to conclude the contract can be binding in order to conclude a contract. There is no such restriction and can therefore freely issue or deny consent for non-essential data, and in particular for the purpose of profiling, commercial communications, marketing.

**DATA PROCESSING METHODS:** The processing of your data takes place by means of manual tools and by means of manual/paper archiving and by electronic and automated tools, with methods strictly related to the purposes indicated above. Where consent has been given, processing may also take place by profiling or comparing data. The Company has adopted technical and organizational measures to prevent and limit the risk of loss, deterioration, theft of your data, and to ensure its recovery in a reasonable time in the event of a

"data breach". The processing takes place in order to guarantee security, the protection and confidentiality of your data.

**WHO CAN COME TO KNOW YOUR DATA:** Within the Company, the following may become aware of your personal data, as data processors or processors:

- employees, managers and directors or partners who have or hold, by law or by company statute, administrative, collaborators or commercial roles subject to self-employment contracts that operate within the company structure. Adequate training and instructions have been provided to these personnel by the Company to protect the conservation, maintenance, updating and security and confidentiality of your data. Consent to the processing by such staff is not required as it is inherent in the necessary procedures provided by law. It is possible that the data controller delegates the processing of your data to other sub-managers, who are in turn instructed on how to correctly process the data.

Outside the Company, your data may be processed by:

- collaborators subject to non-employment contract working outside the structures
- suppliers of the services purchased
- salespeople subject to non-employee employment contracts operating outside the company structures
- consultants of any kind (for example, lawyers, doctors or accountants, engineers, architects, labor consultants or other professionals registered or not registered in professional registers), who perform technical and support tasks on behalf of the Company (in particular: legal services, IT services, shipping) and corporate control.

**THE HOLDERS:** For the pursuit of the aforementioned purposes, the Company may communicate or in any case transmit your data to certain subjects, including foreign ones, who will use the data received as autonomous joint holders, except in the case where they have been designated by the Company as "responsible" for the processing of their specific competence. Some of the joint controllers are: Telecom S.p.a., Cegeka S.p.a., OneDoc, Zucchetti, Best Union Company S.p.a., Matematici, Facebook. It is your right to request and obtain the list of third parties to whom these data are transmitted. The list can be found at the Company's registered office or on simple request to be sent to the email address [info@magicland.it](mailto:info@magicland.it). Your consent is required to transmit the data to these third parties but, in case of refusal, the Company may not be able to provide the requested services or fulfill the obligations for which it has committed itself. The Company uses IT systems jointly with third parties, who therefore become joint controllers of the processing and relations with them are governed by a specific contractual agreement.

**TRANSFER OF DATA ABROAD:** Your data may be transferred to a foreign country. In this case, if this happens within the European Union, your data will be treated in the same way as in Italy. In case of transfer to countries outside the European Union, they will be treated respecting the rights provided in your favor by the European Regulation. If your data are transferred to a country outside the EU, it is possible that they are processed by subjects who guarantee compliance with the rights provided for in the European Regulation through voluntary adhesion by the same with general measures. The transfer of data will take place in any way through tools that guarantee the protection of the data from intrusions by third parties.

**DURATION OF DATA RETENTION AND RIGHT TO OBLIVION:** Your data will be kept by the Data Controller, in respect of the purposes envisaged, for the time necessary for the performance of the relationship with you and to guarantee mutual legal protection of the rights as well as to comply with legal obligations including those of tax nature. The data not necessary for these latter purposes will be removed within the maximum period provided for by the right to oblivion and recognized, as indicated further in this information, or, at your request, even in a shorter time if not in conflict with the rights of the owner. Therefore: All data of the interested party that should not be kept for specific legal obligation will be deleted within 10 years. For the images referred to in the video surveillance system, they will be canceled within 30 days of collection. For the images collected, for commercial purposes, at the Photo Points, the same, if not object of purchase by the customer, will be canceled within 24 hours of the acquisition, if purchased the same will be canceled within 30 days of the acquisition.

**PROFILING:** With regards to profiling logics, the Company carries out this activity on the data provided for the purpose of implementing its offer, improving the services provided (both paid and free ones present in the Park), monitoring the quality and efficiency of its suppliers and the activities carried out. The logics in particular used by the Company for profiling are:

- type of family unit;
- geographical origin;
- identification of specific targets in case of events;
- assessments made by the customer.