



PERSONAL DATA SECURITY POLICY

The Management and all staff of Hotiday S.r.l., a company operating in the hotel hospitality sector, are committed to ensuring the confidentiality, integrity, availability and resilience of the personal data processed by the Organisation, in order to safeguard data subjects' rights and freedoms while ensuring compliance with legal, regulatory and contractual requirements, as well as the resulting positive impact on the company's market reputation that a serious commitment to protecting its customers' privacy can generate.

Data security requirements are consistent with the Organisation's operating procedures, and the adopted Organisational Model for Personal Data Protection is the instrument that enables information sharing, the proper conduct of operations and the reduction of information-related risks to acceptable levels.

The definition of roles and responsibilities, together with the specific identification of personal data processing activities and the corresponding analysis of the risks to which those data may be exposed, forms the context in which the Organisational Model has been implemented and is kept dynamically up to date as that context continually evolves.

Business continuity and emergency plans, data backup procedures, protection against malware and intrusions, system access controls and reporting mechanisms for information security issues are further key elements of this policy. Monitoring indicators for each of these areas are defined in the System documentation and supported by specific procedures.

All relevant persons within Hotiday S.r.l., processors external to the Organisation that process personal data on behalf of the Controller, and independent controllers with whom the Company has decided to share certain processing activities ensure that their conduct complies with this Policy and the Organisational Model that implements it. All staff involved in processing personal data are formally appointed and receive the necessary and appropriate training in this regard.

The Organisational Model is subject to continuous and systematic reviews and improvements, and the Company remains committed to effectively maintaining compliance with the requirements of Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data.

Naples, 5 June 2024

The Data Controller
Federico Di Carlo