

Privacy Policy of Hankyu Travel International Europe S.R.L.

1. Information on the collection and processing of your personal data.

1. Below we provide information about the collection and processing of your personal data. Personal data are all data, that make you identifiable. For example: name, address, email or telephone number.
2. 'Controller' according to the General Data Protection Regulation (GDPR) Art. 4 (7) is Hankyu Travel International Europe S.R.L., main office in Rome, Via Torino 150, 00184 Roma, Italy Tel. +39-06-4743108. We are represented in Munich and Madrid. You can find more information on <http://hankyu-euro.com/en/about>
For the better protection of your personal data we have designated an external data protection officer, whom you can reach via email at dpo@enobyte.com
3. If you contact us via email or via our contact form on the website, we will store and process the information provided by you (name, email, other voluntary entries into the free text field) in order to answer your enquiry. Answering your enquiry in a satisfactory manner is our legitimate interest according to Art. 6 (1) f) of GDPR.
4. Should your enquiry make clear your wish to book a travel with us, we will additionally process your data to support you, and find routes and services suitable for you.
5. Should you use the reservation form on our website we will process the provided information (dates of travel, name, email, telephone number and other voluntarily provided information) in order to check the booking and contact you. This is to be understood as us taking steps at your request prior to entering into a contract according to Art. 6 (1) b) of GDPR as we try to offer you a travel plan according to your wishes.
6. Data collected in the context of points 1.3, 1.4 and 1.5 will be deleted when the storage is no longer necessary, or we restrict the processing should legal retention periods exist.
7. On occasion we use external providers to process and store your data. They are carefully selected by us, are bound by our instructions and it has been established that they use effective technical and organizational measures to ensure the safety of your data. The contract and measures are reviewed regularly.
8. We only transfer your data to third parties if this is necessary for fulfilling the contract - for example transmitting booking data -for billing, or if we are required to do so by law. All other transferal is bound by your express consent.

2. Your rights

2.1. At any time you have the following rights in regard to your personal data:

- Right to access
- Right to rectification or erasure
- Right to restriction of processing
- Right to data portability
- Right to revocation of consent / Right to object

- 2.2. You can send in requests in regards to these rights by any means, for example by contacting our data protection officer via email at dpo@enobyte.com
- 2.3. At any time you can lodge a complaint to a supervisory authority if you feel we do not process your data lawfully. For example you can contact the Italian Data Protection Authority. Their contact details can be found here: http://www.garanteprivacy.it/web/guest/home_en

3. Collection of personal information when you visit our website

3.1. If you visit our website simply to browse, and do not use our contact form, certain personal information is automatically transmitted to our servers by your browser. The following data is collected and is a technological necessity to show you the website in a secure and stable manner.

- IP-Address
- Date and time of the request
- Time difference to Greenwich Mean Time (GMT)
- Contents of the request (the website to be displayed)
- Access state / HTTP-Code
- Amount of data transmitted
- Website that directed the request
- Browser
- Operating System and interface
- Language and version of your browser software

Legal basis for this collection and processing is Art. 6 (1) f).

3.2. Furthermore, the website stores cookies on your computer. Cookies are little text files that are stored on your hard drive, which can provide certain information to us. Cookies cannot run programs or infect your pc with viruses. They are only used to make our website easier to use and more effective.

3.3. This website stores transient cookies. These are automatically deleted when you close your browser. These session cookies allow us to attribute multiple requests to one user by a so called session-ID. They allow us to process the information you provided in the contact form. They do not track you across websites. They are only used to provide you with our online services.

3.4. Google Analytics

3.4.1. This website uses Google Analytics, a service for web analysis provided by Google Inc. ("Google"). Google Analytics uses cookies to enable analysis of your usage of our site. Information generated by the cookies will usually be transmitted to servers in the US and stored there. In case of IP-anonymization your IP-address will be shortened beforehand in servers located in the EU or states in the European Economic Agreement. Only in rare exemptions the full IP-address will be transmitted to the US and shortened there. By our instruc-

tions Google will use the gathered information to analyse your usage of our site, to compile reports on website-activities and to provide further services in relation to internet usage and website usage to us.

- 3.4.2. The IP-address transmitted by your browser for Google Analytics will not be combined with other data that Google holds.
- 3.4.3. You can prevent cookies from being stored as described in 3.6. Furthermore, you can prevent the collection of cookie-generated data in relation to your usage of this site (including your IP-address) by Google, as well as the processing of such data by downloading and installing the Plug-In from the following address: <https://tools.google.com/dlpage/gaoptout>
- 3.4.4. We use Google Analytics with the extension “_anonymizeIp()”. IP-addresses are only processed after being shortened, making it impossible to relate the collected data to any individual. Therefore, any data collected about you containing personal data will therefore be unrelatable to you personally and personal data is immediately deleted.
- 3.4.5. We use Google Analytics to learn more about the usage of our website in order to continuously improve it. By referencing the statistical reports generated, we can make our offerings more interesting to our users. For the rare cases where personal information is transmitted to the US, Google has subjected itself to the EU-US Privacy Shield. More information on this framework can be read here: <https://www.privacyshield.gov/EU-US-Framework>
- 3.4.6. The legal grounds for this use of Google Analytics is Art. 6 (1) f) of GDPR
- 3.4.7. Information on the third party provider: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.
Terms of use: <https://www.google.com/analytics/terms/en.html>
Overview of privacy: <https://support.google.com/analytics/answer/6004245>
Privacy Policy: <https://policies.google.com/privacy>

3.5. Google Maps

- 3.5.1. On this website, we offer Google Maps to provide you with interactive directions to our offices.
- 3.5.2. When visiting our site Google will receive information that you have opened the corresponding subsite. Furthermore, the data described in 3.1 is also transmitted. This is unaffected by any existing or non-existing account with Google. If you are logged into your Google Account, the information will be automatically matched with your account. If you do not wish for this matching you have to log out before viewing the directions. Google stores your data as usage profile and uses it for advertising, market research and/or demand-actuated design of their services. While you have the right to object to this building of usage profile, such requests need to be directed to Google.
- 3.5.3. Further information on the purpose and extent of this data collection and the processing can be found in the privacy policy of Google: <https://policies.google.com/privacy> There you can also find information about your rights and ways to change the settings according to your privacy preferences. Google processes data in the US and is subject to the EU-US Privacy Shield framework. More on this framework: <https://www.privacyshield.gov/EU-US-Framework>

3.6. You can configure your browser-settings to reject or accept cookies according to your preferences. This could affect the functionality of our website.

4. Contact form

4.1. Apart from the purely informational usage of our website, we also offer you a contact form to reach us more easily. In this form, you have to provide some personal information which we will store and use for contacting you. It is our legitimate interest to provide you with hassle-free communication and convince you of our offerings. You only have to provide your email and your name. These are then encrypted and safely transferred to our servers. The legal basis for this transfer is Art. 6 (1) f) of GDPR, as ease of contact and offering of our services is our legitimate interest as business.

5. Revocation of consent and objection to the processing

5.1. If you gave consent to any processing of personal information by us, you can at any time revoke this consent. Such revocation will end the future legal basis on which the processing takes place, except for where the processing is based on legitimate interest ((Art.6 (1)f)). We will no longer be able to process your information and will ask all third parties that may have received your information as part of the consented processing to delete your information.

5.2. If we base our processing on a legitimate interest (Art. 6 (1) f)), you can object to this processing. When sending us your objection, please explain the reasoning why we cannot process your personal data as described. In case of a objection we will contact you to explain our justified grounds for continuing the processing, or we will stop the processing.

6. Data security

6.1. To safeguard your data, all information you provide to us via this website is encrypted using TLS, a so called transport encryption. It ensures that no unauthorized third party has access to your data while it is being transmitted to our servers.

6.2. Backups are encrypted.