

PRIVACY POLICY

1. PURPOSE AND LEGAL BASIS OF THE TREATMENT

For Intermundial XXI SL (hereinafter also referred to as "Intermundial"), is an insurance broker, (Spanish VAT number B-81577231) with the registered office in Calle Irún, 7, 28008, Madrid, Spain, with the branch in Italy at Via Giuseppe Revere , 16, 20123 Milan, (P.IVA 07579270963 - CF 97601340157), is duly authorized to carry out insurance brokerage activities in the territory of the Italian Republic under a system of establishment and free provision of services and is registered in the European Union List of Intermediaries, held by IVASS with the number. J - 1541 and code UE00007640, as owner of the portal www.fit2trip.it, the protection of the privacy of its users is very important.

We take the data protection of our customers seriously.

We have therefore decided to draft a detailed document regarding the privacy policies that we have adopted.

This Privacy and Data Protection Notice (hereinafter "Information") has been prepared to provide the User with all the information necessary to understand the scope and purpose of data processing by Intermundial.

This document describes, among other things, the personal data collected by Intermundial the purposes for which the personal data of the User are intended, the methods of treatment and the security measures adopted to protect them.

Following a policy of transparency and fairness, in compliance with the regulations in force and with particular reference to the EU Regulation 2016/679 (hereinafter referred to as the "Privacy Regulation" or "Regulations"), Intermundial XXI SL, as data controller, provides Users with the information regarding the processing of their personal data as part of their use of the services available within the site www.fit2trip.it, so that Users themselves can decide, freely and voluntarily, if they wish to provide the personal data, which is necessary during the purchasing process, to Intermundial XXI SL for any service offered by the company.

This information is updated regularly, according to the legislation in force, to guarantee the correct processing of personal data.

2. DEFINITIONS

- "User or Users": is the natural or legal person(s), of a private or public nature, who accesses and uses the site, either by registering with it or by proceeding with such registration.
- "Registered User": a natural person who accesses and uses the site after creating a "User Account".
- "Data Controller": a natural or legal person, of a public or private nature, or an administrative body, who takes decisions on the purposes, contents and use of the data.
- "Data Processor": natural or legal person, public authority, service or any other entity, to which the Data Controller entrusts the processing of personal data, individually or in collaboration with others, as indicated in the European Regulation.
- "Personal Data": information that identifies or identifies an individual.

3. ORIGIN OF DATA

The User can freely and voluntarily access the Intermundial website (www.fit2trip.it) and can use it to obtain quotes and purchase products. In order to offer its products and services adequately, Intermundial requires a series of personal data that can be provided directly or indirectly by the User, by registering the data on the site or by technological systems.

Furthermore, by accepting this Information, the User declares to have understood and accepted the fact that Intermundial will only have access to the data made available by the User through the site, for the purposes described in section 5, for the purpose of review and analysis.

4. TYPE OF DATA PROCESSED

During the purchase process, Users will be required to provide the name, address, e-mail address and telephone number regarding themselves and all other subjects to be insured.

Intermundial processes the personal data indicated in the User registration form, which includes name, address, e-mail address, date of birth, dates of stay, credit card data and health data. Furthermore, Intermundial collects other digital personal data, such as IP address, origin of the links used, cookies, plugins or other tracking technologies.

Intermundial does not store credit card data, but only the information necessary for the correct management of the outsourced payment services.

The information regarding the User will be used under the conditions accepted at the time of registration, as a User on the website www.fit2trip.it.

Customers can change the recorded information stored by Intermundial at any time by sending an e-mail to the Customer Service team at: customerservice@fit2trip.it.

Except for the fields in which it is otherwise indicated, the answers to the questions on personal data are voluntary, a possible missing answer will not affect the reception of the services by the User. In cases where insurance is purchased, web users must be aware of the fact that Intermundial is the data controller of the personal data provided during the purchase and following the subscription of any insurance offered on the site www.fit2trip.it.

The personal data collected during the purchase process, as well as any other data collected as a result of the relationship established between the User and Intermundial, will be included in a personal data file called "CUSTOMERS".

The Data Controller of personal data contained in the aforementioned file is Intermundial.

5. PURPOSE OF THE PROCESSING OF PERSONAL DATA

The main purpose of the processing of personal data is the management of the contract between the User and Intermundial and the appropriate fulfillment of the same.

The data collected will be processed by Intermundial without the need for explicit consent pursuant to art. 6 paragraph 1 letter b) of the Privacy Regulation, to provide services provided by the Terms of Use.

In particular, the data will be processed in order to:

1. ensure that the content of the site is suitable for the needs of the User;
2. send notifications informing that product activation is in progress;
3. improve the User's experience;
4. formalise the contract with the User;
5. determine the client's risk based on the health data provided;

6. determine the amount of the insurance premium due through the health data provided;
7. prevent fraud and maintain security, in accordance with the provisions of current legislation or for the legitimate defense of Intermundial's interests;
8. provide the services presented on the fit2trip.it website, mainly related to the promotion and sale of insurance products offered by insurance companies and insurance intermediaries;
9. facilitate the use of the entire site in its different sections and versions, for example by recognising Users returning to the site, simplifying and customising the User experience, saving searches for each type of product;
10. provide active consultancy and telephone assistance to customers, even over a prolonged period in relation to the individual User needs, relating to a request for one of the products mentioned above;
11. provide updated quotations and carry out any periodic check-ups on the convenience of the products chosen with respect to the current market conditions;
12. collect and manage customer feedback on the service provided by Intermundial;
13. respond to comments and reports sent by customers;
14. assess the economic reliability and solvency of Users as potential customers, through cross-checks with external databases and/or through access to the information systems of authorised companies, as a prerequisite for any subscription of contracts for the services requested;
15. monitor and prevent fraud and unauthorized use of the service.

The data collected will allow Intermundial to manage the relationship with the User. The data collected will also be processed by Intermundial without the need for explicit consent, in order to pursue its legitimate interest pursuant to Article 6 paragraph 1 letter f) of the Privacy regulation to promote its services to Users who have already benefited from it, through sending information and commercial communications by e-mail, without prejudice to the Users' right to oppose the processing at any time.

Intermundial may use the data or allow its use by third parties to offer the User information on products and services that may be of interest to the user. If the User does not want their data to be used in this way, they must select the corresponding box on the registration form.

User's data will not be disclosed to third parties except for the following cases:

- following the consent provided by the User for the distribution and / or disclosure of the data;
- for the provision of services performed by third parties, including - among others - payment processing, data analysis for determining customer risk, certain aspects of the marketing services offered by Intermundial in order to finalise contracts;
- if we are required to disclose or share the User's personal data in order to comply with any legal obligations or to protect rights, property or the safety of Intermundial towards our customers or others. This includes the exchange of information with other companies and companies for the purpose of protection against scams;
- by legal provision, governed by a decision of the competent judicial or regulatory authority or, where necessary, in order to preserve rights or interests;
- if Intermundial or a substantial part of all its assets were to be purchased by third parties, in which case the personal data of the customers would be among the transferred assets.

It is understood that this treatment is carried out in compliance with the provisions of art. 130 paragraph 4 of Legislative Decree 30 June 2003 no. 196 and the provisions of the European Regulation.

The data collected may be processed by Intermundial, subject to the explicit and free consent of the interested party, pursuant to Article 6, paragraph 1, letter a) of the Privacy Regulation, for the following purposes:

- A. sending promotional communications and advertising material, the offer of products and / or own or third-party services, carrying out surveys and market research, by any means including in particular the use of telephone with operator and / or automated systems (e.g. SMS, MMS, fax, auto responders, push notifications, social media);
- B. the profiling of users for commercial and marketing purposes based on the methods of use of the Site, the interest shown for the different products / services and exposure to advertising;
- C. the transfer of personal data to other companies for the sending of promotional communications and advertising material, the offer of products and / or own or third-party services, the completion of surveys and market research, by any means including in particular use of telephone with operator and / or automated systems (eg SMS, MMS, fax, auto responders, push notifications, social media).

Unless otherwise indicated, it is understood that you agree that your data may be disclosed to affiliated companies or Intermundial employees, including the insurance company, in order to fulfill the purposes described.

The data collected will be processed by Intermundial without the need for explicit consent pursuant to art. 6 paragraph 1 letter c) of the Privacy Regulation, to comply in general with legal and regulatory obligations.

The customer gives his explicit consent, pursuant to letter a) paragraph 2 article 9 of the Privacy Regulation, to the processing of special categories of personal data such as - by way of example - genetic data, biometric data intended to uniquely identify a natural person, data relating to health or sexual life.

We inform you that the communication of personal data necessary for the stipulation and execution of the contract is mandatory and any refusal to provide the data will not allow us to provide the services requested.

6. RIGHTS OF THE USER

Intermundial, in full compliance with the provisions of articles 15, 16, 17, 18, 20 and 21 of the Privacy Regulation, informs you that you have the right:

- to request access to personal data (Article 15) and the rectification (Article 16) or the cancellation of the same (Article 17) or the limitation of the processing (Article 18) that concern it or to oppose their processing (Article 21) in addition to the right to data portability (Article 20);
- to withdraw the consent at any time without jeopardising the lawfulness of the processing based on the consent given before the revocation;
- to lodge a complaint with the Guarantor for the protection of personal data.

We inform you that, pursuant to Article 21 of the Privacy Regulation, you may at any time object to the processing of your personal data for marketing purposes, in writing by sending an email to the following address: info@fit2trip.com.

To exercise the rights indicated above, the Company's references are as follows:

Data Controller: Intermundial XXI SL

Headquarters in Italy: 20123, Milan (MI) at Via G. Revere n. 16

Telephone number: 0230510118 if calling from Italy; +390230510118 if calling from abroad or Email address: customerservice@fit2trip.com

7. MODIFICATIONS TO THE CONFIDENTIALITY STATEMENT

Intermundial reserves the right to make unilateral changes deemed appropriate at any time and without notice. Any changes to the data protection information will be published on this page and will be considered, for that reason only, received and known by the User.

If a User does not express any opposition to these changes, according to the terms established by law, Intermundial will consider it a tacit consent on their part to the new terms.

The fit2trip.it website uses cookies. For more information on this, please refer to the dedicated policy provided under current legislation and accessible on the internet page: <https://www.fit2trip.it/informativa-cookie.asp>

8. METHOD OF DATA PROCESSING

The data processing may be carried out using manual, automated, computerised or telematic tools designed to memorise, manage and transmit the data.

The data processing will always be carried out by using the most rigorous security systems and according to the security provisions defined by Intermundial as responsible for the data.

The data collected will be stored and can be transmitted to our suppliers in encrypted form outside the European Union. By providing us with personal data, the User accepts their possible transfer to third countries or international organisations pursuant to art. 44 of the Privacy Regulation.

For any questions concerning this Information, the User can contact Intermundial at the following address: info@fit2trip.com.

DATA PROCESSING HOLDER

Independent data controller is Intermundial XXI SL.

The User has been informed and accepts that the personal data provided (or that will be provided in the future to Intermundial) are processed by/on behalf of Intermundial.

DATA STORAGE PERIOD

The personal data collected to provide the services provided in the conditions of use and processed for the purposes indicated in point 5) and will be kept for the entire duration of the policy as well as a period to deal with any claims of the insured or third parties.

The personal data and contact details of Users will be treated on the basis of express consent, with the retention period considered extended until the revocation of consent is given by the User, even if subsequent to the deadline referred to in the previous paragraph has passed.

PROTECTION OF PERSONAL DATA - BASIC INFORMATION

Data Controller	Intermundial XXI S.L.
Purpose of treatment	<p>Preparation of estimates, purchase and management of insurance policies;</p> <ul style="list-style-type: none"> - consultancy in the stipulation and formalisation of the insurance contract; - claims management; - sending commercial communications on products, sending newsletters, site updates; - execution of the insurance contract; - consent for commercial communications.
Data Processor	Intermundial XXI S.L.
Data recipient	<p>Verisk Risk Rating, which provides medical risk assessment services.</p> <p>Axa Travel Insurance and IPA, which provide insurance services, claims management services and medical assistance.</p> <p>Firemelon Ltd, which manages the technical part of the systems and the Fit 2 Trip website.</p>
Rights	The user has the right to access, rectify, limit the processing, delete his / her data and request its portability or cancellation
Provenance	The data is collected directly when the User provides us with the data necessary to purchase a travel insurance policy from this site

Commercial communications	In order to improve the performance of our services, we develop a commercial profile of our customers based on the information provided and this allows us to offer them products and services of the following types according to their interests: - travel insurance; - insurance and protection products
Further information	You can consult other detailed information on Data Protection by visiting this page on our website