

## Privacy Policy

Michelangelo Iberian Travel SL is a tour operator specialized in organizing group travel in Italy and the Mediterranean region. In order to provide our services, it is necessary to process users' or clients' personal data. In compliance with information obligations, we have developed this privacy policy to provide you with all the necessary details so that your data is processed based on fully informed consent.

This document complies with the provisions of the *Ley Orgánica 3/2018* of December 5 on the Protection of Personal Data and Guarantee of Digital Rights, as well as Regulation (EU) 2016/679 of April 27, 2016 (GDPR), concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data.

### Source and Categories of Personal Data Processed

The personal data we process comes from information provided by intermediary tourism service companies regarding end consumers, as well as data entered directly by users in our information request forms or through any direct interaction with us.

The categories of data we process include general information such as:

- **Identifying data:** Full name, email address, ID number (DNI, passport, or equivalent document, if required for service provision).
- **Special category data** (Article 9 GDPR): Only if voluntarily provided by the user, such as allergies, food intolerances, disabilities, and dietary restrictions. This information is shared only with service providers (e.g., airlines, hotels) to ensure proper service delivery.

All data is handled with the security and confidentiality measures established by applicable laws and will be deleted from our systems once the service or trip is completed. If the user does not consent to this processing, we may be unable to offer personalized services.

All personal data will be treated confidentially, in accordance with Michelangelo Iberian Travel SL's privacy and security policies.

### Data Controller

The data controller is Michelangelo Iberian Travel SL (hereinafter "Michelangelo"), with tax ID number (N.I.F.) B-19873157 and registered office at Calle Tuset 20-24, 7º-8º, 08006 Barcelona.

You can contact us via:

- **Mail:** At the address listed above.
- **Email:** [iberian@michelangelo.travel](mailto:iberian@michelangelo.travel)

### Purpose of Data Processing

Michelangelo Iberian Travel will use the personal data provided by users for the following purposes:

1. **Service execution:** To collect the necessary data for the management and fulfillment of the contracted service.
2. **User communications:** To contact users via email or phone regarding services, changes, or important notices.
3. **Information requests:** To handle inquiries and respond to user requests.
4. **Marketing purposes:** Clients may receive updates on similar products or services. You can opt out of this processing at any time.
5. **Cookies:** To analyze user behavior and improve website experience.
6. **Recruitment:** To process candidate data for potential job opportunities.

Michelangelo does not transfer data outside the European Economic Area (EEA: EU + Liechtenstein, Iceland, and Norway) and does not conduct any automated profiling of users.

### Legal Basis for Data Processing

The processing of personal data is based on:

- **Contractual necessity** (Article 6.1.b GDPR): To manage the requested service.
- **Legitimate interest** (Article 6.1.f GDPR): To respond to user inquiries or offer similar services to clients.
- **Legal obligations** (Article 6.1.c GDPR): Compliance with regulations such as

Royal Decree 933/2021 on traveler registration.

- **Explicit consent:** For processing sensitive data or participating in recruitment processes.

If the user does not provide the required information, the contract cannot be completed or fulfilled.

## Data Retention Period

Michelangelo Iberian Travel will retain personal data for the time necessary to provide the service and for the period required by applicable law.

- **Contract-related data:** Retained until the end of the contract, and then blocked for 5 years (the legal limitation period for claims arising from contractual relationships).
- **Marketing data:** Retained until the user requests deletion.

## Recipients of Personal Data

Collected data may be shared with third-party providers (hotels, transport companies, tour guides, airlines, etc.) solely for the purpose of delivering the contracted service. Outside of these cases, data will not be disclosed to third parties unless required by law.

## Social Media Presence

Michelangelo is present on Instagram, Facebook, and LinkedIn. We only process data posted directly by Michelangelo. Users are responsible for managing their own privacy settings on each platform.

## User Rights

Users have the right to:

- Access their personal data.
- Request correction of inaccurate or incomplete data.
- Request the deletion of their data.
- Restrict data processing under certain conditions.
- Object to processing for marketing purposes.

- Request data portability to another service provider.

To exercise these rights, please send a request to:

- **Email:** iberian@michelangelo.travel
- **Postal Address:** Michelangelo Iberian Travel SL, Calle Tuset 20-24, 7º-8º, 08006 Barcelona.

Requests will be processed within one month of receipt (extendable by up to two months in complex cases). If you do not receive a satisfactory response, you may file a complaint with the *Agencia Española de Protección de Datos (AEPD)*.

## Privacy Policy Updates

Michelangelo will periodically update this privacy policy at least once per year or whenever regulatory changes occur. Any updates will be communicated to users.

Last updated: April 2025