

# Privacy Policy

**We respect and protect Your privacy.**

**This notice describes the general privacy policy of EFOIL.FUN. By visiting our website (www.foil.fun), you are accepting the practices described in this notice as stated below.**

## Article I. SUMMARY OF HOW WE USE YOUR DATA

- a) What do we do with your information and what is the legal basis for this use? EFOIL.FUN uses your personal information to process and facilitate bookings, provide you with highly individualized services, respond to your requests for information, inform you of our products and services and other purposes as set out in this notice.
- b) Consent: Where we rely on your consent, such as for marketing our products and services to you, use of cookies, and collection and use of your sensitive personal data, you may withdraw this consent at any time.
- c) Cookies: Our site uses cookies to track visitors using our website, analyze trends and usage patterns for research and marketing purposes. You are not obliged to accept cookies.
- d) Your rights: You have certain rights to your personal information under applicable laws, including a right to object to some of the processing which EFOIL.FUN carries out.

## Article II. WHAT INFORMATION DO WE COLLECT FROM YOU?

EFOIL.FUN collects certain information about you to operate effectively and provide you with the best experiences with our services. The specific kind of information collected will depend on the context of your interactions with EFOIL.FUN staff, and the services you use. The following are examples of the information that may be collected:

- a) Contact information (name, email address, mailing address, and phone number);
- b) Payment information (including payment card numbers, billing address, and bank account information);
- c) Demographic data (date of birth, gender, country of residence, and preferred language);
- d) Information related to your reservation;
- e) Information necessary to fulfill your special requests;
- f) Copies of your correspondence if you contact us;
- g) Information related to your use and interaction with our website.

## Article III. HOW DO WE USE YOUR INFORMATION?

EFOIL.FUN collects your information to operate effectively and provide you with the best experiences with our services. EFOIL.FUN may collect, use, and disclose the information it collects for a variety of reasons, including for the following purposes:

- a) Fulfillment of Reservation and Other Purchases: We may process information relating to transactions that you enter with us and/or through our website (“transaction data”). The transaction data may be processed for the purpose of completing your reservation, supplying the purchased goods and services, customizing our services to your preferences, seeking your feedback on your trip experience, and keeping proper records of those transactions.
- b) Marketing Partnerships: To offer you periodic opportunities to sign up for (and enjoy privileges) our various services.
- c) Response to Inquiries: We may process information contained in or relating to any communication that you send to us (“correspondence data”). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record keeping.
- d) Internal Business Purposes: For our internal business purposes, such as data analysis, audits, developing new products, enhancing the website, improving our services, identifying usage trends and visiting patterns, determining the effectiveness of our promotions, and meeting contractual obligations.
- e) Administrative and Other Communications: To send you important information regarding our website, changes to our terms, conditions, and policies, or other administrative information (e.g., information about your reservations, such as reservation confirmations).
- f) Marketing and Promotions: To communicate news and promotions to you relating to EFOIL.FUN products and services and other products and services we think may be of interest to you, and to operate sweepstakes, contests, or other marketing or promotional activities.
- g) Safety and Security: To maintain your safety and security as well as that of other guests and personnel, while you enjoy our managed services.
- h) Our Legal Duties: To comply with legal and regulatory requirements or demands in accordance with applicable law, a court order, subpoena, or other legal process.
- i) Additional Uses: We may also use your data other ways as described to you when you provide such information to us.

The legal basis for processing your personal information is made up of one or more of the following reasons: (i) your consent, and/or (ii) providing the services you have requested, and/or (iii) compliance with applicable laws, regulations, court orders or other legal process.

#### Article IV. WHAT ABOUT COOKIES?

We use tracking tools like browser cookies and web beacons to collect information from you. We collect information about users over time when you use this website or any apps that we may make available on our website. We may have third parties collect personal information this way.

#### Article V. DOES EFOIL.FUN SHARE INFORMATION ABOUT YOU?

It is essential that we are able to share information across multiple jurisdictions in order to provide you with and to maintain the best possible service. The specific kind of information we share will depend on the context of your interactions with EFOIL.FUN, and the services you use. Accordingly, your personal information may be shared with the following parties

insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy:

- a) to any third-party Service Provider used on your trip with EFOIL.FUN;
- b) to the representative or travel advisor that has supplied us with your personal information (for example, your travel agent, personal assistant, employer or spouse who has provided us with your details);
- c) to our trusted business partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures;
- d) to our marketing and advertisement partners to provide you with more-relevant ads on our site and to encourage you to return to our site;
- e) to any third parties to the extent necessary with respect to a sale of all or part of our business operations or assets.

## Article VI. DOES EFOIL.FUN TRANSFER INFORMATION OVERSEAS?

As a rental service entity that operates in Italy and with the geographical diversity of our customers, it is essential that we share information across multiple jurisdictions in order to provide you with and to maintain the best possible services. By using and/or purchasing our goods and services, we may transfer your personal information across multiple jurisdictions. Accordingly, insofar as reasonably necessary for the purposes, and on the legal basis, set out in this policy, we may transfer and store your personal information:

- a) in those countries in which we manage and operate trips and services and/or operate sales offices.
- b) in such other countries where our third-party service providers, advisors and consultants are located, which changes from time to time.

Such transfers may be to a country which may not provide the same level of privacy protection as that provided by the country in which the information was collected but we will take reasonable steps (including entering into data transfer agreements based on the European Commission model clauses, or requiring compliance with the EU-US Privacy Shield) to ensure that while your personal information is within our control, we will handle your personal information using reasonable security and confidentiality procedures to keep your personal information secure and confidential.

## Article VII. HOW SECURE IS YOUR INFORMATION?

We implement reasonable administrative, organizational and technical safeguards and security measures to protect personal information within our control from unauthorized access, acquisition, disclosure, destruction or alteration, accidental loss, misuse or damage. We regularly review and monitor such safeguards and security measures.

## Article VIII. HOW LONG WILL EFOIL.FUN KEEP YOUR INFORMATION?

To the extent permissible by applicable law, we will retain your personal information for such period as necessary to satisfy or to fulfill the following:

- a) the purposes for which that personal information was provided,
- b) an identifiable and ongoing business need, including record keeping,
- c) a specific legal or regulatory requirement, and/or
- d) a requirement to retain records that may be relevant to any notified regulatory investigations or active legal proceedings.

Where there is no sufficient justification to retain such personal information, such personal information will be safely and securely deleted, disposed of, anonymized and/or blocked.

## Article IX. WHAT RIGHTS DO I HAVE?

In accordance with applicable laws, you may have rights in relation to your personal information. Such rights include:

- a) You have the right to ask us for a copy of your personal information;
- b) to correct, delete or restrict (stop any active) processing of your personal information;
- c) and to obtain the personal information you provide to us for a contract or with your consent in a structured, machine readable format, and to ask us to share (port) this data to another controller.
- d) In addition, you can object to the processing of your personal information in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing (see below "Opting Out").

These rights may be limited, for example if fulfilling your request would reveal personal information about another person, where they would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping. Relevant exemptions are included in applicable data protection laws. We will inform you of relevant exemptions we rely upon when responding to any request you make.

## Article X. OPTING OUT

If you do not wish to remain on our database and to receive our personalized mailings (electronic or otherwise) or other communications, please note that you may opt out of our database by using the "Unsubscribe" option at the footer of our email communications, or by sending an email to [info@efoil.fun](mailto:info@efoil.fun).

## Article XI. HOW LONG WILL YOU RETAIN MY DATA?

Where we process personal information for marketing purposes or with your consent, we process the data until you ask us to stop and for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to

send you direct marketing or to process your data so that we can respect your request in future.

Where we process your financial information, we will only keep the information for as long as necessary for the purpose/s for which it is collected and up to two months thereafter. In relation to all your other personal data including registration data, we will not retain your data for longer than required for the purposes indicated above, and will delete personal data if they are no longer necessary for the purposes for which they are collected or otherwise processed, unless we are required to keep the data to comply with applicable legal obligations.

## Article XII. QUERIES OR COMPLAINTS

If you have any queries or complaints regarding this Privacy Policy or use of your personal information, please contact our data protection manager using the contact details set out in the "Opting Out" section above.

## Article XIII. WHAT ABOUT LINKED WEBSITES?

The linking of third-party websites to this website does not indicate any association with or endorsement by EFOIL.FUN. EFOIL.FUN does not assume responsibility or liability of any nature whatsoever for the activities conducted or information contained in the third-party websites.

## Article XIV. CHANGES TO THIS PRIVACY POLICY

This privacy policy will be subject to change from time to time. The effective date of this current privacy policy is set out at the end of this document. Your use of this website constitutes your acceptance of the current terms as set out in this privacy policy.

EFFECTIVE DATE: 01 January 2026

With kind regards.

Your EFOIL.FUN team