ufirst Users’ Privacy Policy
Version of January 1st, 2019

U-First S.r.l. - with registered office in Via Giovanni Amendola n. 46 – 00185 Rome (Italy) -, Fiscal Code, VAT number 12753241004, R.E.A. n. RM-1397673, fully paid-up share capital of Euro 180.000,00, travel and tourism agency license no. GR327984 released by Regione Lazio (the “Company” and/or “U-First”), pursuant to Section 13 of the Legislative Decree 196/2003 ("Privacy Code") and Section 13 of the Regulation (EU) 2016/679 (the "Regulation"), hereby provides the following privacy policy, acting as the controller of the personal data of the users (the “Users”) who intend to register or are already registered to ufirst platform through the website www.ufirst.com (the “Website”) or the U-First application for mobile devices (the “App”).

This privacy policy is provided to the Users in addition to the U-First Website Privacy Policy.

1. Data processing purposes
User's personal data (name, surname, email address, ordinary mail address, billing data, mobile telephone number, date of birth and gender) will be processed by the Company for the following processing purposes:
  a) contractual obligations (Section 6, paragraph 1, letter b) of the Regulation and Section 24, paragraph 1, letter b) of the Privacy Code), i.e. in order to perform the ufirst Terms and Conditions or, before accepting such Terms and Conditions, to reply to specifics requests made by the Users;
  b) administrative and accounting purposes (Section 6, paragraph 1, letter b) of the Regulation and Section 24, paragraph 1, letter i-ter of the Privacy Code), i.e. in order to carry out organizational, administrative, financial or accounting activities, such as internal organization and other activities that are necessary in order to comply with contractual and pre-contractual obligations;
  c) compliance with the applicable law (Section 6, paragraph 1, letter c) of the Regulation and Section 24, paragraph 1, letter a) of the Privacy Code), i.e. to comply with obligations provided for by national or EU laws and regulations.

Providing the personal data for the above-mentioned processing purposes is optional but necessary, since failure to provide such data will imply the impossibility for the User to subscribe to ufirst through the Website and/or the App. By clicking on the App installation button, the User agrees for the App to be installed on his/her mobile device. The consent to the installation of the App is optional but necessary, since
failure to give such consent will imply the impossibility to install and use the App.

2. **Other processing purposes: marketing (sending advertising material, direct sale and commercial communication)**

Subject to the User’s consent, which can be given by selecting the relevant check-box during the registration process on the Website and/or the App, the User’s personal data (name, last name, ordinary mail address, email, telephone number) can be processed by the Company for marketing purposes (e.g. sending advertising material, direct sale, market research and commercial communication), as well as for push notification to the device on which the User has installed the App, in order to contact the User by email, and/or SMS and/or MMS to propose the purchase of products or services offered by the Company or third parties, offers, promotions or commercial opportunities. The User’s consent to the processing of his/her personal data for marketing purposes is optional and, failing to provide such consent, the possibility for the User to subscribe to ufirst and use the App or the Website will not be jeopardized. Also, in case where the User has given his/her consent, the User may opt-out at any time from receiving further promotional communications, by contacting U-First as indicated in paragraph 10 below. Moreover, the User can opt-out also in a selective manner, by way of example by opting out from receiving e-mail marketing communications but continuing to receive promotional SMS/MMS, or vice versa. Should the User not have given his/her consent to the processing of his/her personal data for marketing purposes, his/her mail address, email address and telephone number will be processed by the Company only for service communications which are necessary for the use of ufirst.

3. **Other processing purposes: profiling**

Subject to the User’s consent, which can be given by selecting the relevant check-box during the registration to the Website and/or the App, the User’s personal data (i.e. both the data inserted in the registration form and the information relating to the goods and services in relation to which a Ticket has been reserved and/or a Fast Pass has been purchased) may be processed by the Company also for profiling purposes, that is to infer the User’s preferences and consumer habits, in order to send him/her commercial offers consistent with the identified consumer profile. The User’s consent to the processing of his/her personal data for profiling purposes is optional and, failing to provide such consent, the possibility for the User to subscribe to and use ufirst will not be jeopardized. Also, in case where the User has given his/her consent, the User may opt-out at any time from the profiling, by contacting the Company as indicated in paragraph 10 below. Data relating to the details of the goods or services to
which the Tickets and/or the Fast Passes refer to will be retained by the Company for profiling purposes for a maximum of a 12-month period or for the different time period allowed from time to time by the applicable privacy law.

4. **Other processing purposes: tracking**
The Company may process the Users’ personal data, including their IP addresses and their browsing data on ufirst, for the purpose of pursuing a legitimate interest (in accordance with Section 6, paragraph 1, letter f) of the Regulation and Section 24, paragraph 1, letter g) of the Privacy Code), that is to collect statistical information, to perform analysis on the App usage, or to improve the Users’ experience on ufirst. To this end, the Company uses the tools provided by of third-party suppliers, in their quality of processor of the personal data. The Users may opt-out at any time from the tracking, by contacting U-First as indicated in paragraph 10 below. Data will be retained by the Company for a maximum of a 12-month period or for the different time period allowed from time to time by the applicable privacy law.

5. **Other processing purposes: geolocation**
In order to be able to use in full all functions of the App and/or the Website, it is suggested to activate the geolocation function, which allows ufirst to localize the User and show to the latter, in real time, the Points which accept the Tickets and the Fast Passes and that are placed nearby, also by sending push notification to the device on which the User has installed ufirst. If the geo-location function is disabled, the ufirst experience may not be optimal. If the data relating to geolocation are stored for profiling purposes and the User has given his/her consent to such processing, data will be retained by the Company for a maximum of a 12-month period or for the different time period allowed from time to time by the applicable privacy law.

6. **Processing means**
User’s personal data is processed with electronic and non-electronic means, duly taking into account the relevant processing purposes, and in any case by ensuring the security and the confidentiality of the data. The data will be processed and stored by U-First for the time necessary to pursue the purposes referred to in the previous paragraphs and in any case until the revocation of consent to the processing by the User.

7. **Persons who may have access to the data**
U-First’s employees or collaborators entitled to manage the Website and reply to the Users’ requests or send the promotional communications may have access to the Users’ personal data. Such individuals, who have been
formally appointed by the Company as persons in charge of the processing, will process the Users’ personal data exclusively for the purposes indicated in this policy and in accordance with the provisions of the Privacy Code and of the Regulation.

Furthermore, third parties appointed by the Company as external data processors, such as IT and logistic service providers for the operation of the Website or the App, outsourcing and cloud computing service providers, professionals and advisors, marketing companies sending marketing communication, which process the Users’ personal data on behalf of the Company, may have access to the Users’ personal data. Users have the right to obtain a list of the data processors appointed by the Company, by contacting the Company as indicated in paragraph 10 below.

8. **Data communication and dissemination**

For the sole purpose of performing the Terms and Conditions and allow the identification of the User, some User’s personal data can be communicated to the Operator before which the Ticket and the Fast Pass will be used and/or other additional third parties in the case where such communication is necessary in order to allow the User to use the Ticket and/or the Fast Pass or to comply the applicable laws. The Operators will process the data as autonomous and independent data controllers.

By using the feature “Invite a friend” or other similar features on the App and/or the Website, the User’s name, last name and email address will be communicated to the invited friend.

The User’s personal data will not be disseminated in any manner whatsoever.

9. **Additional communication of the personal data to third parties**

During the usage of ufirst, the Company may ask the User to give his/her consent to the communication of his/her personal data (including those data processed for profiling purposes) to third parties, by selecting a specific check-box. In case the User gives his/her consent, his/her personal data will be communicated by the Company both to the Operator, for whose goods or services the Ticket has been reserved and the Fast Pass has been purchased, and to the following categories of third-party businesses: businesses of the large-scale retail trade; entertainment or sport or tourism or art businesses, business in the field of transports of persons or goods (the Operator and such third parties are hereinafter jointly referred to as the “**Third Parties**”). The Third Parties, acting as autonomous data controllers, will process the User’s personal data for their own marketing purposes (sending advertising material, direct sale and commercial communication), i.e. in order to contact the User by email and/or SMS or MMS to propose the purchase of products or services
offered by the Third Parties or other businesses, offers, promotions or commercial opportunities. The User’s consent to communication of his/her personal data to the Third Parties is optional and, failing to provide such consent, the possibility for the User to subscribe to ufirst and/or use the services offered thereon will not be jeopardized in any way whatsoever. Also, in case where the User has given his/her consent, the User may opt-out at any time, by contacting the Company as indicated below. The Company hereby informs the User that his/her personal data will be processed by the Third Parties as autonomous data controllers on the basis of a specific privacy policy that will be provided by these Third Parties to the User. Should the User not wish to receive further commercial communications by the Third Parties, to which the data have already been communicated by the Company, such request shall be addressed directly to such Third Parties.

10. **User’s rights**

Pursuant to Section 7 of the Italian Privacy Code, the Company hereby informs the Users that they have the right to obtain confirmation as to whether or not personal data concerning them exist, regardless of their being already recorded, and communication of such data in intelligible form. Users also have the right to be informed (i) of the source of the personal data; (ii) of the purposes and methods of the processing; (iii) of the logic applied to the processing, if the latter is carried out with the help of electronic means; (iv) of the identification data concerning data controller and data processors; (v) of the entities or categories of entity to whom or which the personal data may be communicated and who or which may have access to said data in their capacity as data processor(s) or person(s) in charge of the processing. Furthermore, Users have the right to obtain a) updating, rectification or, where they have an implied interest, integration of the data; b) deletion, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed; c) certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected. Users have the right to object, in whole or in part, a) on legitimate grounds, to the processing of their personal data, even though they are relevant to the purpose of the collection; b) to the processing of their personal data, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys. The Users will be able to exercise the following rights set forth in Sections from 15 to 22 of the same:
the right of access to their personal data (i.e. the right to obtain from the Company confirmation as to whether or not personal data concerning them are being processed, and, where that is the case, access to the personal data and the information set forth in Section 15 of the Regulation); the rights to rectification (i.e. the right to obtain from the Company the rectification of inaccurate personal data or the right to have incomplete personal data completed); the right to erasure (i.e. the right to obtain from the Company the erasure of personal data concerning them where one of the grounds indicated in Section 17 of the Regulation applies); the right to restriction of processing where one of the grounds indicated in Section 18 applies; the right to data portability (i.e. the right to receive personal data in a structured, commonly used and machine-readable format and to transmit those data to another controller without hindrance). The Users also have the right to withdraw their consent at any time. The consent withdrawal will not affect the validity of the processing based on their consent before the withdrawal. The Users have the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them pursuant to Section 6, paragraph 1, letter e) or f) of the Regulation, including profiling based on these provisions. Should their personal data be processed for direct marketing purposes, they have the right to object to the processing of personal data concerning them at any time, including the profiling to the extent that it is linked to such direct marketing. The above-mentioned rights can be exercised by contacting the Company by (i) registered mail to the address “Via Giovanni Amendola n. 46, 00185 Rome (Italy)” and/or a fax to the number +39 06 87811673, (ii) email to the email address support@ufirst.com or (iii) lodging a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) (www.garanteprivacy.it).

11. Cookies used on the App
By registering to ufirst through social networks, the Company will receive form the relevant social network only some of the User’s personal data, which are necessary to fill-in the registration form. Each time the User logs-in the App or the Website by using the relevant social networks’ user name and password, the Company will request the social network a confirmation that such user name and password are correct. Before logging-in through the specific social network button, the User is invited to read carefully the privacy policy provided by the social networks, concerning the use of these cookies. If the User does not wish to receive such cookies, the User shall register on ufirst without using the social network button. Here below is a list of the cookies relating to the social networks that are used on ufirst, with a specification of the links that will lead to privacy policies of such social networks:
<table>
<thead>
<tr>
<th>Cookie Name</th>
<th>Type of cookie</th>
<th>Link to the privacy policy</th>
</tr>
</thead>
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Should the User wish to disable such cookies, please refer to the privacy policies of such social networks that are used to log-in. By disabling these third-party cookies, you will no longer be able to log-in through social networks.