

WEBSITEPRIVACY POLICY

1. CONTACT DATA

Data Controller

TraWell Co S.p.A., Via Olona n.183G, 21013, Gallarate and its subsidiaries, namely:

Data Processor:

TraWell Co S.p.A., Via Olona n.183G, 21013, Gallarate, e-mail privacy@trawellco.com, phone 0331 777154

2. DEFINITION OF PERSONAL DATA

In the course of the activities offered by Safebag, your personal data may may be collected, including for instance the customer's name, surname, telephone number, e-mail address, travel route, baggage destination, bank details and photos.

Personal data is any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

3. CONSENT AND PURPOSE OF DATA PROCESSING

The primary basis on which we collect, use and disclose your personal data is with your consent, unless otherwise permitted or required by law. How we obtain your consent will depend on the circumstances, as well as the sensitivity of the information collected. Subject to applicable laws, your consent may be express or implied, depending on the circumstances and the sensitivity of the personal information in question. If you choose to provide personal data to us, we assume that you consent to the collection, use and disclosure of your personal data as outlined in this privacy policy.

Typically, we will seek your consent at the time your personal data is collected. Where we want to use your personal data for a purpose not previously identified to you at the time of collection, we will seek your consent prior to our use of such information for this new purpose.

You may withdraw your consent to our collection, use or disclosure of your personal data at any time by contacting us using the contact information below. However, before we implement the withdrawal of consent, we may require proof of your identity. In some cases, withdrawal of your consent may mean that we will no longer be able to provide certain products or services. Please also note that certain data will remain within the Services for us to fulfill its contractual obligations, even after you withdraw your consent.

If you provide personal data about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect such information from you, and to use and disclose their information as described in this privacy policy.

In this context, personal data are processed only upon your specific and distinct consent in order to:

- Manage information requests and complaints about the services purchased;
- Receive e-mails/sms with offers and commercial initiatives.
- Publish photographs on social media to promote the company's image online;

4. MEANS OF COLLECTION AND DATA RETENTION TIME

Your personal data may be collected when you visit our website, in particular when you fill the contact form, when you contact us on our social media, or when you use your services.

Safebag will process personal data for the time necessary to fulfil the aforementioned purposes. More specifically:

- documents relating to the handling of complaints will be kept in our files for at least 10 years after the claim is closed.
- personal data relating to purchase details will be kept for marketing purposes for a period of no more than 24 months from their registration, unless the data is made anonymous in such a way that the data subjects cannot be indirectly identified.

5. DATA ACCESS AND SHARING

Your data may be made accessible for the purposes referred to in art. 2:

- to employees and collaborators of Safebag, on a need-to-know basis, in their capacity as persons in charge of data processing and/or internal data processors and/or system administrators;

to third-party companies such as any entity within our group, such as TRAWELL CO SpA, companies entrusted with customer care service and social network management, and companies in charge of IT system maintenance, in their capacity as external data processors.

6. DATA COMMUNICATION

Safebag can communicate your personal data for the purposes referred to in art. 2 to:

- Banking institutions for claims settlement;
- Airport Lost&Found Offices at luggage destination.
- Companies controlled by Safe Bag SpA, operating at the branch where services were purchased.

7. SOURCES

In order to trace missing luggage, airport databases may be consulted upon request.

8. SECURITY OF PERSONAL INFORMATION

We have implemented commercially reasonable physical, organizational, contractual and technological security measures with a view to protecting your personal information from accidental or unlawful destruction, loss or theft, unauthorized access, disclosure, copying, use or modification. We have taken steps to ensure that the only personnel who are granted access to your personal information are those with a business 'need-to-know' or whose duties reasonably require such information.

Despite the measures outlined above, no method of information transmission or information storage is 100% secure or error-free, so we unfortunately cannot guarantee absolute security. In the case of a breach of security safeguards, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any information that you provided to us has been compromised), please contact us immediately using the contact information on our website.

9. TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES

Your personal data are stored in Italy. Our customer care services are entrusted to a third-party company to manage contact and call centre activities from Moldova, guaranteeing appropriate privacy protections. If requested, calls can be managed directly from Italy.

Therefore, your personal data may be transferred to countries/provinces/states other than your country/province/state of residence, which may have different privacy rules. It is subject to the laws of such jurisdiction and may be disclosed to the governments, courts or law enforcement or regulatory agencies of that country. However, our practices regarding your personal data will at all times continue to be governed by this Website Privacy Policy and by applicable laws.

10. RIGHTS OF THE DATA SUBJECT

- 10.1 The data subject has the right to access and obtain confirmation of whether or not personal data concerning him/her exist, even if not yet registered, and to receive communications in intelligible form.
- 10.2 The data subject has the right to obtain information about the origin of the personal data; the purposes and methods of data processing; the logic applied in case of processing with electronic tools; identifying details for the data controller, the data processor and their representative; the subjects or categories of subjects to whom the personal data may be communicated or who can learn about it in their capacity as appointed representatives of the State, data processors or persons in charge of data processing.
- 10.3 Under circumstances, and depending of your location, you may have the right to obtain:
 - a. rectifications, updates, corrections or, if interested, the integration of data;

- b. the erasure, deletion, transformation into anonymous form or blocking of unlawfully processed data, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c. confirmation that the operations referred to in a) and b) above and their content have been brought to the attention of those to whom the data had been communicated or disseminated, except in cases where fulfilling this condition proves impossible or requires the use of means manifestly disproportionate to the protected right;
- d. a copy of the information we hold in a common and interoperable format;
- e. limitation of processing of personal data about him/her, or to oppose the processing of personal data about him/her, in whole or in part, for legitimate reasons, even if the data are relevant to the purpose for which they are being collected;

Furthermore, the data subject has the right to:

- f. revoke consent at any time to the use and disclosure of the personal data, without prejudice to the lawfulness of data processing that was based on consent before revocation;
- g. bring a complaint to a Supervisory Authority;

A formal declaration may be requested from Safebag certifying that your requests have been effectively resolved and brought to the attention of those to whom data had previously been disseminated and disclosed.

As a data subject, you may also designate a third person with a copy of a power of attorney, or of a proxy signed in the presence of an official, or a proxy signed and presented with an unauthenticated photocopy of the data subject's identification document. Safebag is obliged to reply to the request within 15 days from the date of submission or 30 days if the answer is problematic. In any case, within 15 days you will be notified in writing of any reason for delay. You may exercise your rights at any time by sending a registered letter (A/R) or an e-mail to Safebag.

If you have any questions, please contact our Privacy Officer using the contact details in the "Contact Us" section.

11. CONTACT US

Our Privacy Officer will respond to your requests for access or correction and handles complaints you may have about our personal information practices.

If you have any questions or comments about this policy or the protection of your personal data, please contact our Privacy Officer at: privacy@trawellco.com