

PRIVACY POLICY

LEOLANDIA SPA company, with registered office in Via Ozanam 2, 24121 Bergamo and LEOLANDIA VIAGGI SRL, with registered office in Via Fasana 21, 00195 Rome, both acting as joint data controllers (hereinafter "Data Controllers) pursuant to Articles 4 and 28 of the Italian legislative decree dated 30th June 2013, no. 196 - Italian Personal Data Protection Code (hereinafter "Code") and to Articles 4, no.7) and 24 of the Regulation (EU) 2016/279 dated 27th April 2016 on the protection of natural persons with regard to the processing of personal data (hereinafter, "EU Regulation"), inform you that they will process your personal data for the purposes and with methods that will be described therein, pursuant to Article 13 of the Code and Articles 13, 14 of the EU Regulation. "Processing of personal data" shall mean any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

Types of processed data

Individuals will be required their consent to acquire and process personal data relating to natural persons, including but not limited to: name and surname, email, date of birth, province, telephone and mobile numbers, username, password the user selected and any further data that may be required in each initiative. It is hereby stated that "sensitive" data shall not be processed (as stated in the Code, Article 4, letter d), namely "special category of personal data" (under Article 9 of the "EU Regulation") revealing racial or ethnic origin, trade union membership. The processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning natural person's sex life or sexual orientation shall also be prohibited.

It is also declared that "judicial data" shall not be processed (as stated in the Code, Article 4, letter e), namely "personal data relating to criminal convictions and offences" referred to Article 10 of the EU Regulation.

In certain cases, such as the season pass subscription or in any other cases, in which the nature of the product and/or service imposes the identification of the user through images, it is hereby stated that data consisting of photographs depicting a natural person will also be processed, but it is specified that no specific technical means or devices allowing the unique identification or authentication of a natural person will be used. In accordance with the privacy policy referred to the Italian Legislative Decree no.196/2003 and the Regulation (EU) 2016/679, such data are not be considered biometric data (pursuant to Article 4 and in accordance with 51 of the EU Regulation)

The processing of photographs should not systematically be considered to be processing of special categories of personal data as they are covered by the definition of biometric data only when processed through a specific technical means allowing the unique identification or authentication of a natural person.

Methods of processing

We inform you that data will be processed with the support of manual tools or proper information systems for the aforementioned purposes. The processing of personal data will not be carried out by any automated decision making process, including profiling. The data subject shall not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly affects him or her.

A) Core purposes of data processing and legal basis for processing

The processing of data provided will be made in compliance with the law in force and without prejudice to the confidentiality obligations, on the legal basis of consent, under Article 6, letter a) of the EU Regulation, exclusively for the following purposes:

- 1) To enable the user visiting the website <http://www.leolandia.it> to register and login with the username and password the user selected;

- 2) To enable the user to book and/or buy (online, directly at the theme park or in any other manner) single tickets, tickets for groups and/or season passes or any valid admission ticket aimed to entering "Leolandia" theme park located in Capriate San Gervasio (BG), via Vittorio Veneto 52, as well as to enable the user to buy and use any optional and ancillary services connected with the purchase of a valid admission ticket to the aforementioned theme park (including tourism services, such as hotel reservations and the shuttle bus service aimed at enabling guests to visit "Leolandia" theme park);
- 3) Marketing and sales purposes. More specifically:
 - Request for data through newsletters: submission of information, sales, promotion and marketing notices by Leolandia spa using the software "MailUp" and emails with the use of data controllers' email addresses.
 - Marketing campaigns on other websites concerning advertising messages on "Leolandia" theme park (including but not limited to: GOOGLE, FACEBOOK, CRITEO, AWIN, OUTBRAIN, SALECYCLE, HIC MOBILE)
 - Manual analysis of data obtained through surveys that are submitted using newsletters. Such surveys are filled out anonymously and processed in an aggregate form (for the instance, the "thankyou mail" sent by "Leolandia" theme park after the visit)
 - Contact by the customer service centre and/or personnel of "Leolandia" park through different communication channels (including, but not limited to, email, phone, messaging apps and any other type of communication channel using email or phone aiming to provide any information on the products purchased by the user and/or for sales purposes aiming to propose the purchase of products and services of Leolandia spa and/or LeolandiaViaggi srl, concerning "Leolandia" theme park
 - Management of purchases made by the user online or at "Leolandia" theme park during his/her visit, including but not limited to: provision of any information on the products purchased by the user and/or for sales purposes aiming to propose the purchase of products and services of Leolandia spa and/or LeolandiaViaggi srl, concerning "Leolandia" theme park

The processing of data provided will be made in compliance with the law in force and without prejudice to the confidentiality obligations, on the legal basis of consent, under Article 6, letter a) of the EU Regulation, namely when "processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract", exclusively for the following purposes:

- 4) To enable the customer service centre of "Leolandia" theme park to contact the user through different types of communication channels (including, but not limited to, email, phone, messaging apps and any other type of communication channel) aiming to:
 - provide information and explanation about the product or service when purchasing, pre-purchasing or booking it. The use of such channels is also aimed at providing information and explanation the user may require about themed events the park proposes (including, but not limited to: group visits, birthday parties and themed events);
 - provide different types of information related to Leolandia and its contents;
 - provide assistance on information/critical issues regarding the visit to "Leolandia" theme park

Clarification on the purposes referred to clause 3 (Purposes of the personal data processing for marketing purposes) - Promotional, advertising and marketing purposes, market studies.

The personal data collected for administrative purposes, which are related to the organisation and participation in each Promotional initiative, may be processed (together with any further additional and optional information, such as email addresses, mobile numbers, geographical addresses that might be requested to the data subject in each promotional activity) using paper form (e.g. compilation of forms, coupons and similar supports) and automated/ computer systems, for the purposes specified hereafter, as requested by the General Measure of the Italian Data Protection Authority dated 4th July 2013, which contains the following guidelines to combat spam: commercial promotion, advertising and marketing communications in broad terms, unrequested solicitation for the purposes of recommending the purchase, as

well as conducting market studies, surveys (even by phone, online or forms), statistical processing (in an identifiable form) regarding products and/or services relating to the data controller (hereinafter collectively referred to as "Processing of the personal data for Marketing purposes). With the consent to the processing of the personal data for marketing purposes, the data subject specifically acknowledges such promotional, commercial and marketing purposes in broad terms for processing personal data (including consequential administrative and management activities) and expressly authorises such processing, after giving his/her consent under the procedures set out therein and falling within the scope of Articles 23 (as the data controller may use means for the processing of personal data for marketing purposes, such as operator-assisted phone calls or any other non-electronic devices, non-telematics devices or means that are not supported automated, electronic or telematics systems and/or procedures, including manual contact and by paper-based mail) and 130 of the Privacy Code (as the data controller may use means for the processing of personal data for marketing purposes, such as emails, faxes, sms, mms, automatic systems without human intervention or similar means, including electronic or other telematics platforms) as well as Article 6, paragraph 1, letter (a) of the Regulation.

Under the General Measure of the Italian Data Protection Authority, dated 15th May 2013 and entitled "Consent to the processing of personal data for "direct marketing" purposes through traditional and automated contact means", the attention of data subjects is drawn to the fact that:

1. The consent given for the submission of commercial and promotional communications, on the basis of Article 130, paragraphs 1 and 2 of the Code (namely the submission of emails, fax, sms, mms, automatic systems without human intervention or similar means, including electronic or other telematics platforms) will result in receiving such communications by such automated contact means as well as traditional contact means, such as paper mail and operator-assisted phone calls;
2. The right of the data subject to object to processing of personal data for "direct marketing" purposes, performed through the aforementioned automated contact means, shall extend to traditional contact means and, even in this case, this is without prejudice to the possibility of exercising such right partially, as set out in Article 7, paragraph 4 of the Code, concerning the means for processing and types of processing;
3. In the event that the data subject does not intend to give consent to the processing in accordance with aforementioned terms, the possibility for him/her to express his/her willingness to receive communications for marketing purposes through traditional contact means only remains valid, where indicated: this option may be exercised free of charge by sending an email to privacy@leolandia.it. For the purposes of the principle of fulfilment of data controller's obligations with regard to the privacy, in accordance with the principles to simplify compliance (Article 2 of the Code) and under the General Measure of the Italian Data Protection Authority dated 15th May 2013 and entitled "Consent to the processing of personal data for "direct marketing" purposes through traditional and automated contact means", the data controller also informs that the specific consent form for the processing of personal data will be uniform and comprehensive and will refer to different and possible marketing purposes stated herein (without generating different consent forms for each marketing purpose of the data controller), without prejudice for the data subject to notify the data controller, even afterwards, a different intention regarding the consent or refusal to the marketing purposes.

In order to process for the marketing purposes, it is compulsory to obtain a specific, separate, express, documented, preventive, informed, free and optional consent. Accordingly, whereby the data subject gives specific consent, he/she should be informed in advance and aware that the purposes of data processing are of commercial, advertising, promotional and marketing nature in broad terms. In order to ensure transparency, please note that the data will be collected and processed based on the specific consent:

1. To provide the data subjects giving aware consent with advertising and information material (e.g. newsletters) for promotional purposes or commercial solicitation pursuant to Articles 23 and 130 of the Privacy Code;
2. To conduct direct sales activities or placement of products or services of the data controller;

3. To send commercial information; to undertake interactive commercial communications via email also pursuant to Article 58 of the Italian legislative decree no. 206/2005;
4. To conduct statistical and market studies and research, as well as telephone and electronic surveys;
5. To send unsolicited commercial communications pursuant to Article 9 of the Italian legislative decree dated 9th April 2003 no. 70 implementing the Directive on Electronic Commerce 2000/31/CEE, which lays down that unsolicited commercial communications shall be immediately and unambiguously identifiable as such and contain information to the effect that the addressee of the message may refuse future receipt of such communications;

With the consent to the processing of the personal data for marketing purposes, the data subject specifically acknowledges and authorises any further and possible secondary processing. Even where the data subject gives the consent to authorise the data controller to pursue all the purposes mentioned from point 1 to 5, he/she will remain free to withdraw at any time, without any formality, by sending a clear communication to that effect to privacy@leolandia.it. Following the receipt of the opt-out request, the data controller will be responsible for promptly removing and deleting the data from the database used for the processing of personal data for marketing purposes. For the same purposes of data deletion, the data controller will also be responsible for informing any third parties to whom the data have been disclosed of the request for erasure and requiring them to comply with deletion or removal. On receipt of the request for erasure, data deletion will be confirmed. As provided in Article 21 of the EU Regulation, it is specifically and separately stated that where personal data are processed for direct marketing purposes, the data subject has the right to object to processing of personal data concerning him/her for such purposes at any time. Furthermore, where the data subject object to processing of personal data for direct marketing purposes, personal data shall not be processed for such purposes.

B. Communication and dissemination of personal data for the achievement of the objectives of the processing. Transfer of personal data outside the European Union

In all cases referred to above, LEOLANDIA SPA OR LEOLANDIA VIAGGI SRL can share and communicate personal data, which are subject to processing, to third parties requiring such communication to achieve the aforementioned purposes, as well as to undertake promotional/commercial initiatives and to comply with legal requirements (including but not limited to: GOOGLE, FACEBOOK, CRITEO, AWIN, OUTBRAIN, SALECYCLE, HIC MOBILE, or MailUp (software used to send emails) or individuals, companies or law firms that provide assistance, advice or collaboration in accounting, administrative, legal, fiscal and financial matters relating to promotional/commercial initiatives;

In relation to the purposes specified in paragraph A no. 2, where the user books "Park+Hotel" tourist packages, shuttle service aiming to facilitate the visit to the theme park or any other ancillary services connected with the purchase of a single ticket, season pass or any other valid admission ticket, personal data will be shared and communicated to third parties, namely business partners involved in the purchase of the specific product with the aim of enabling the user to use and purchase such tourist packages. Partner shall primarily mean the hotel that has been selected as accommodation by the user and/or the agency that provides the shuttle bus service, namely Leolandia Express.

Furthermore, in order to achieve the aforementioned purposes, personal data can be communicated to any other third party in the event that law requires such communication or where the regulation or other related standards require compliance with obligations.

Transfer and communication of personal data outside the European Union

In certain cases, the transfer can take place outside the European Union, based on and in compliance with Articles 45, 46 and 47 of the EU Regulation. More specifically, personal data may be transferred to companies located in the United States of America (such as Google and Facebook) by virtue of the

existence of the specific European Commission adequacy decision (Article 45 of the EU Regulation), namely the European Commission Implementing Decision EU 2016/1250 dated 12th July 2016 pursuant to Directive 95/46/EC of the European Parliament and of the Council on the adequacy of the protection provided by the EU-US Privacy Shield Framework (also known as Privacy Shield), as well as the existence of amending and implementing measures of the same.

In the event of transfer of personal data to third countries outside the European Union, other than the United States of America, the transfer can take place only after checking compliance with Articles 45, 46 and 47 of the EU Regulation, in accordance with appropriate safeguards and after specifying the means to obtain a copy of such data or the location where personal data have been made available.

In the interests of transparency, a list of countries that are deemed by the European Commission to have an adequate level of protection for personal data, as well as authorisation mechanisms and further approved rules under Articles 45, 46, 47 of the EU Regulation can be found on this link: <http://www.garanteprivacy.it/home/provvedimenti-normativa/normativa/normativa-comunitaria-e-internazionale/trasferimento-dei-dati-verso-paesi-terzi> .

With reference to Article 13, paragraph 1, letter (d) of the Privacy Code and to Article 13, paragraph 1, letter (e) of the EU Regulation, entities and categories of entities acting as data processors, which may be informed of personal data of the user, are hereby specified with a specific list of categories, as described here below: • personnel of the Data controller, which are appointed as data processor; • third parties the Data controller involves in the organisation and administrative management of commercial and promotional initiatives under the circumstances existing at that time;

In addition to the personnel of the Company, certain processing of your personal data may also be carried out by third parties with registered offices in Italy and abroad, to which our organisation entrusts some (or part thereof) activities necessary for the supply of aforementioned services. In such case, these entities shall act as autonomous data controllers or may be designated as Data Processors or Subjects in charge of the processing. Data processors and subjects in charge of the processing shall receive relevant instructions, with specific reference to the minimum security measures aiming to ensure the security and confidentiality of the information. The aforementioned third parties are essentially include in the following categories: Credit recovery companies, invoicing data processing companies, companies appointed to print and send invoices to customers, Consultancy firms, Credit transfer companies, Agents and Business Solicitors, franchisees, technological services providers, content providers.

Dissemination

It is hereby stated that personal data of users shall not be disseminated. For statistical purposes, the Press Office of “Leolandia” theme park can use aggregate and anonymous data in order to send communications to the editorial staff and newspapers aiming to prepare a general report on the performance and development of “Leolandia” theme park.

C. Compulsory or optional consent for the achievement of the objectives of the processing.

In all cases referred to paragraph A no. 1, no. 2 and no. 3, and on the basis of the applicable regulations of the Privacy Code and EU Regulation, the consent is optional.

However, the inaccurate or incomplete consent or the refusal to give the consent will result in the following outcomes:

- In relation to the purposes specified in paragraph A no. 1, the impossibility for the data subject to register and login to the website <http://www.leolandia.it> to purchase a valid admission ticket to “Leolandia” theme park or any other product/service sold on the aforementioned website;

- In relation to the purposes specified in paragraph A no. 2, the impossibility to purchase a valid admission ticket to “Leolandia” theme park (ticket(s) and/or season pass(es)) and any other product and/or service, which are proposed and sold on the website <http://www.leolandia.it>, as well as the impossibility to use any optional and ancillary services connected with the purchase, such as tourist booking and shuttle bus services;
- In relation to the purposes specified in paragraph A no. 3, the impossibility to receive any information for promotional/commercial/advertising and marketing purposes relating to “Leolandia” theme park. Please note that the consent to provide personal data to the data controller, as well as the consent to the processing of data for marketing purposes and the communication to third parties relating to the processing of data for marketing purposes and with the methods, as described above, are optional (and revocable, without any formality, by sending an email to privacy@leolandia.it). The failure to transmit data will not result in any consequences, with the exception of the impossibility for the data controller and any other third parties to process the data for marketing purposes, as above described. In the event of refusal of consent, there will be no interferences and/consequences on the possibility to participate in promotional initiatives under the circumstances existing at that time.

D. Storage period and further information.

Under Article 13, paragraph 2, letter (a) of the EU Regulation, it is hereby stated that personal data to be processed shall be stored as follows:

- In relation to the purposes specified in paragraph A no.1, personal data shall be stored for the time required to achieve such purposes, but not less than 2 (two) years from the date of consent or for a shorter period in the event that the data subject withdraws his/her consent for this purpose specifically.
- In relation to the purposes specified in paragraph A no.2, personal data shall be stored for the time required to achieve such purposes, but not less than 2 (two) years from the date of consent or for a shorter period in the event that the data subject withdraws his/her consent for this purpose specifically.
- In relation to the purposes specified in paragraph A no.3, personal data shall be stored for the time required to achieve such purposes, but not less than 10 (ten) years from the date of consent or for a shorter period in the event that the data subject withdraws his/her consent for this purpose specifically.
- In relation to the purposes specified in paragraph A no.4, personal data shall be stored for the time required to achieve such purposes, but not less than 2 (two) years or for a shorter period in the event that the data subject exercises a specific right that is found to be incompatible with the processing of personal data.

E. Data controller and processors

The identification details and contact details of the joint data controllers are the following:

- 1) LEOLANDIA SPA, with registered office in via Ozanam no. 2, 24121 Bergamo tel: + 39 02 99991100 fax: +39 02 90963469 Email: info@leolandia.it pec: leolandia@pec.it

Data subjects can contact the company to exercise their rights under Article 7 of the Privacy Code and EU Regulation sending an email to: privacy@leolandia.it

- 2) LEOLANDIA VIAGGI SRL, with registered office in via Fasana no. 21, 00195 Rome, tel: +39 02 99991100 fax +39 0290963469 Email: info@leolandia.it pec :leolandiaviaggi@arubapec.it

Data subjects can contact the company to exercise their rights under Article 7 of the Privacy Code and EU Regulation sending an email to: privacy@leolandia.it

The joint data controllers have appointed Mr. Alberto Grippo as “Data processor” (Data Protection Officer or GDO) under Articles 37, 38, 39 of the EU Regulation. Mr. Grippo will fulfill the duties and

responsibilities of his role, in accordance with the EU Regulation. It will be possible to send any notification and request to gdo@leolandia.it.

The updated list of the Data processors and staff appointed to process personal data, where applicable, can be found on the premises specified therein, as well as on the premises of "Leolandia" theme park.

F. Rights of data subjects.

Under Article 7 of the Privacy code and pursuant to Articles 13, paragraph 2, letters (b) (c) and (d), Articles 15 to 22 and 34 of the EU Regulation, we provide the data subject with the following information: a) the data subject shall have the right to request access to, and rectification, erasure of or restriction on the processing of personal data from the data controller. Furthermore, he/she has the right to object and to data portability; b) he/she has the right to withdraw his/her consent at any time without prejudice to the legality of the processing based on the consent given prior to the withdrawal; c) he/she has the right to file a claim to the Italian Data Protection Authority by following the procedures and instructions published on the official site of the Data Protection Authority <http://www.garanteprivacy.it/> d) any rectification, erasure of or restriction on the processing carried out on request of the data subject shall be communicated by the data controller to entities to whom or which data have been disclosed- unless this would be impossible or involve disproportionate effort. The data controller can disclose the details of such entities to the data subject if required by him/her. The exercise of rights is not subject to any constraints and is free of charge.

Where the data controller intends to further process personal data for a purpose other than that for which personal data were collected, he provides the data subject with any information on such purpose prior to any further processing of such data.

In accordance with Article 34 of the EU Regulation, when the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay. The communication to the data subject shall not be required if any of the following conditions are met: a) the controller has implemented appropriate technical and organisational protection measures and those measures were applied to the personal data affected by the personal data breach, in particular those that render the personal data unintelligible to any person who is not authorised to access it, such as encryption; b) the controller has adopted subsequent measure which ensure that the high risk to the rights and freedoms of data subject referred to in paragraph 1 is no longer likely to materialise; c) such communication would involve disproportionate effort. In such a case, there shall be a public communication or similar measure whereby the data subjects are informed in an equally effective manner.

For your convenience, the content of Article 7 of the Privacy Code is reported below, whereas from Article 15 to 23 of the EU Regulation, as well as the standards of the Regulation, can be found on this link: <http://eur-lex.europa.eu/legal-content/IT/TXT/HTML/?uri=CELEX:32016R0679&from=I>

CONTENT OF ARTICLE 7 OF THE PRIVACY CODE

Article 7 (Right to access to personal data and other rights)

1. The data subject is entitled to obtain confirmation of the existence of personal data regarding him, even if they have not been recorded, and their intelligible disclosure.
2. The data subject is entitled to be informed of:
 - a) the source of personal data; b) the purposes and methods of data processing; c) the method adopted in the event of data processing with the support of electronic devices; d) the identification details of the data controller, the data processor and the representative appointed under Article 5, paragraph 2; e) the individuals or groups of individuals to whom personal data can be disclosed or informed as they act as representative appointed in the Territory or designated staff;
3. The data subject has the right to obtain:
 - a) the update, the amendment or, when interested, the completion of data; b) the cancellation, the anonymous transformation or block of data that were processed by infringing the law, including data and information that do not require any storage in relation to the purposes for which data were collected or subsequently processed; c) a certificate stating that the operations referred to subparagraphs a) and b), including their

content, have been communicated to the entities to whom or which data were disclosed or provided, with the exception of the case when this requirement proves to be impossible or entails a manifestly disproportionate compared to the right that is to be protected. 4. The data subject has the right to object, in whole or in part: a) to the personal data processing regarding him/her for legitimate reasons, even though they are relevant to the aim of the collection; b) to the personal data processing regarding him/her for the purposes of sending advertising materials, direct sale or performance of market studies or commercial communication surveys.

Leolandia spa

Leolandiviaggi srl

The undersigned declares that he/she received, read and understood this privacy policy, under Article 13 of the Italian legislative decree no. 196/2003 and Article 13 of the EU Regulation and Article 6, paragraph 1 letter A) of the European Regulation. By signing this form, the undersigned expressly gives his/her consent to the following:

For the purposes referred to paragraph A, point 1:

- To personal data collection and processing,

Date / /

Signature

For the purposes referred to paragraph A, point 2:

- To personal data collection and processing,

Date / /

Signature

For the purposes referred to paragraph A, point 3, the undersigned gives his/her consent to:

1)

Personal data collection and processing for promotional/advertising and marketing purposes;

Date / /

Signature

2)

The transfer of personal data to third parties referred to paragraph B, as well as third parties located outside the European Union;

Date / /

Signature