

Privacy Policy for La Dolce Vita bookings pursuant to Art. 14 European Data Protection Regulation

Arsenale Express S.p.A. with registered office in Via Giovanni Amendola, 46 - 00185 Rome, VAT registration number 1603301004, as data controller (hereinafter, "**Arsenale Express**" or the "**Controller**"), is strongly committed to privacy and the protection of personal data. Therefore, we hereby intend to inform you about the way we will process your personal data in accordance with the General Data Protection Regulation ("**GDPR**") in the context of the booking and sale of the luxury cruise on-rail journeys called "Orient Express La Dolce Vita" (hereinafter, "**La Dolce Vita**").

The processing of your personal data during La Dolce Vita will be governed by a privacy policy that will be provided to you on board of our trains.

1. What personal data will we process?

Your personal data are processed for the purposes indicated in the following paragraph.

More precisely, we can collect:

- personal identification data of the person making the reservation and the Dolce Vita participants,
- contact details (telephone and e-mail addresses),
- Special categories of personal data, e.g. health or disability information.

The data are collected by our partner ACCOR *Société Anonyme*, with registered office at 82, rue Henri Farman CS20077 - 92445 Issy-les-Moulineaux - Nanterre Business Register entry number 602 036 444, and EU VAT number FR 93 602 036 444 (hereinafter "**ACCOR**"), which operates the following La Dolce Vita booking channels:

- The website <https://www.orient-express.com/la-dolce-vita/it/>
- Call centre.

When collecting personal data, Accor acts as an autonomous data controller in accordance with the conditions described in the ['Personal Data Protection Charter'](#).

2. For what purposes will we use your personal data and on what legal basis?

Type of processing	Purpose	Legal Basis	Storage period
a) managing the booking and sale of La Dolce Vita	Your personal data will be used for the purpose of handling your reservation request of La Dolce Vita. Health-related data (e.g. disability) will be processed for the purpose of providing specific assistance on board.	The processing is necessary for the performance of a contract or in order to take steps at the request of the data subject prior to entering into a contract (Art. 6(1)(b) GDPR). Explicit consent (Art. 9(2)(a) GDPR). You have the right to withdraw your consent at any time; however, we may not be able to provide you with the requested assistance and or to carry out your booking, if necessary for the access of La Dolce Vita.	Your personal data will be stored for as long as is necessary to fulfil contractual obligations and obligations imposed by law (e.g. tax obligations).

b) Compliance with legal obligations	Your personal data may be used to comply with any legal obligations.	Compliance with a legal obligation (Art. 6(1)(c) GDPR).	Your personal data will be retained for as long as necessary to comply with legal obligations (e.g. according to tax law, the retention period is 10 years from the end of the contractual relationship).
(c) Protection of a right	Your personal data may be used in order to establish, exercise or defend one of our rights, including in court.	Legitimate interest of the Controller (Art. 6(1)(f) GDPR). The processing is necessary to establish, exercise or defend a right in court (Art. 9(2)(f) GDPR).	Your personal data will be kept for as long as it is necessary to protect our rights.

3. Will your personal data be disclosed to third parties?

Your personal data may be disclosed to third parties, including service providers (e.g. providers of electronic communication services), or other companies within the group to which Arsenale Express belongs that provide intra-group services. Such parties will be appointed as data processors pursuant to Article 28 GDPR.

A full list of such companies will be made available by sending a written request to the contacts below.

Your personal data may also be disclosed to other external parties where there is a legal obligation or option to do so. For instance, your personal data may be passed on to the Judicial Authority at its request in cases provided for by law.

However, Arsenale Express will not transfer your personal data to countries outside the European Economic Area.

4. What are your rights?

You have the right to exercise at any time, free of charge and without any formalities the following rights under Articles 15 to 22 of the GDPR, including: (i) the right of access to personal data (i.e. the right to obtain from Arsenale Express confirmation as to whether or not personal data relating to you are being processed and, if so, to obtain access to the personal data, obtaining a copy thereof, and to the information referred to in Art. 15 of the GDPR), (ii) rectification (i.e. the right to obtain the rectification of inaccurate data relating to you or the integration of incomplete data) or deletion of the same, if one of the reasons indicated in Art. 17 of the GDPR, or the restriction of the processing concerning you (i.e. the right to obtain, in the cases indicated by Article 18 of the GDPR, the marking of stored personal data with the aim of limiting their processing in the future), (iii) the right to data portability (i.e. the right, in the cases indicated by Article 20 of the GDPR, to receive from Arsenale Express, in a structured, commonly used and machine-readable format, the data concerning you, as well as to transmit such data to another data controller without hindrance). You also have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you in accordance with Article 6(1)(e) (performance of a task carried out in the public interest or in the exercise of official authority) or (f) (legitimate interest) of the GDPR, including profiling on the basis of these provisions. You also have the right to withdraw your consent at any time where a processing is based on your consent. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal.

You will not be subject to entirely automated decision-making processes with the effects as under Article 22 of the GDPR.

5. How can you contact Arsenale Express to exercise your rights?

Requests to exercise your rights, as described above, may be submitted to Arsenale Express by post to the address Via Giovanni Amendola, 46 - 00185 Rome or by e-mail to the address [privacy@arsenaleexpress.com]. We remind you that

you always have the possibility to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it) or with the different Supervisory Authority of the Member State of the European Union where you reside or work or where the alleged breach took place.

Last updated: March 2024