

## PRIVACY POLICY

Populi Limited. with registered office in London, 3rd Floor, 114a Cromwell Road, fiscal code and number of registration No. 237217809 (Populi Ltd) in its quality of "Data controller" processes the personal data of the subjects involved in the processing (hereinafter, "Data subject") and in particular of the customers that use and access the website [www.globol.com](http://www.globol.com) (the Website). The Data are provided directly by the Data subject or by the person exercising parental authority on the Data subject, for the following purposes: a) management of the access and use of the relevant services; b) requirements related to the purchase on the Website of mobile travel guide digital content and/or travel tickets; c) statistical purposes on anonymised data; d) delivery of marketing communications concerning discounts, offers, services, and events of Populi; e) delivery of customer satisfaction surveys or questionnaires with regard to Populi products and services; f) profiling purposes; The legal basis for data processing is the execution of a contract (for the purposes under point a), b), c) and d) above), and the Data subject's consent (for the purposes under point e), f) and g)).

2. Populi hereby informs you that: a) for the above-mentioned purposes the Data shall be processed also by computer, telematics, paper and manual instruments, in compliance with the confidentiality and safety rules provided by the law; b) in case of expressed consent to the profiling activity referred to under paragraph 1(f) above, this will entail an automated activity in order to allocate the Data subject into a category of subjects with homogeneous characteristics on the basis of the services previously used, any market surveys that may have been completed and the relevant demographic class.

3. The provision of the Data is optional. Any refusal to provide the Data for the purposes relating to the use and access to the Website referred to under paragraph 1 lett. a), b), and d) shall lead to the impossibility to enjoy the related services offered by Populi. Also, a subsequent possible opposition or revocation of the processing of personal data for the aforementioned purposes shall result in the immediate blocking of the supply of the services offered through the Website. The Data will be also processed in anonymous form for the statistical purposes ones referred to paragraph 1 lett. c). Any refusal to provide consent to the data processing for the further purposes referred to under paragraph 1), lett. e), f) and g) namely for the delivery of customer satisfaction surveys and profiling activities, shall not have any consequences, subject to the impossibility for the Data subject to be informed about marketing and promo-advertising initiatives from Populi, any market surveys and to receive commercial communications of Populi.

4. The Data shall not be disseminated. Within the organization of the Data controller, the Data may be processed by the relevant offices entrusted with the execution of certain processing activities (i.e. Administration, Commercial, Marketing, IT). In the performance of its activities and of its information, cultural, promo-advertising, marketing, profiling, merchandising and sponsorship initiatives, Populi, in its quality of Data controller, may communicate the Data to the third parties mentioned in Footnote 1 and appointed as Data Processor for the purposes of managing the Registration and the provision to the related services or for any further purposes to which the Data subject has agreed. The complete list of Data Processors appointed by Populi can be easily known at no charge by sending a request to the email address indicated under paragraph 7 of this Privacy Notice.

5. The Data shall be stored on servers located within the European Union. Any Data collected for the purposes indicated under paragraph 1 (a) shall be retained for the entire duration of the Data subject's Registration to Populi's website. Any Data collected for the purposes indicated under paragraph 1 (b) shall be retained for the period of time that is necessary to the provision of the purchased services, and subsequently for no longer than the statutory limitation period. Any Data collected for the purposes of processing indicated under paragraph 1 (e) and (g) shall be retained until the Data subject withdraws his/her consent to receiving commercial communications or requests the deletion of Data, except for cases where the Data controller needs to retain such Data to defend its rights in relation to any disputes that are on-going at the time of the request, or upon formal request from public authorities. The Data collected for the purposes of processing indicated under paragraph 1(f) shall be retained until the Data subject withdraws consent to the marketing activities described therein, or presents a request for deletion of such Data, subject to the foregoing.

6. The Data subject has the right to: a) obtain the termination of processing for direct marketing purposes, also in relation to services identical to those already provided by our company; b) obtain information in relation to the purposes for which Data are processed, to the period of processing and to the subjects to whom the data are communicated (right of access); c) obtain the rectification or integration of incorrect Data concerning the Data subject (right to rectification); d) obtain the deletion of Data concerning the Data subject in the following cases (i) the data are no longer necessary for the purposes for which they were collected; (ii) the Data subject has withdrawn his/her consent to the processing of Data, if these are processed on the basis of his consent; (iii) the Data subject has opposed the processing of Data concerning him/her, in case these are processed for our legitimate interest; or (iv) the processing of Data does not comply with the law. However, it is to be noted that the retention of Data by Populi is also lawful if it is necessary in order to fulfill a legal obligation or to ascertain, exercise or defend a right in Court (cancellation right); e) to obtain that the Data concerning the Data subject are only stored without any further use in the following cases: (i) the Data subject disputes the accuracy of the Data, for the period that is necessary for allowing Populi to verify the accuracy of such Data; (ii) the processing is unlawful but the Data subject objects to the deletion of the Data; (iii) the Data are necessary for ascertaining, exercising or defending a right in Court; (iv) the Data subject has opposed the processing and is awaiting the verification of the possible prevalence of Populi's legitimate interest to the processing (limitation right); f) receive in a common, structured, commonly used and machine-readable format, all Data concerning the Data subject, if these are processed under a contract or on the basis of the Data subject's consent (portability right).

Please also note that the Data subject has the right to contact the Data Protection Authority (Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF) in order to enforce his/her rights with regard to the data processing.

7. The Data controller pursuant to art. 24 of the GDPR is Populi Ltd. with registered office in London, 3rd Floor, 114a Cromwell Road, fiscal code and number of registration No. 2549200547. The Data controller can be contacted for any requests or reports at the following contact details: [privacy@populi.io](mailto:privacy@populi.io)

The Data controller has appointed a Data Protection Officer pursuant to sec. 37, 38 and 39 of the GDPR, which is domiciled for the position at the address London, 3rd Floor, 114a Cromwell Road and can be contacted at the email address [privacy@populi.io](mailto:privacy@populi.io) for any matter concerning the Data processing.

By sending an email to [privacy@populi.io](mailto:privacy@populi.io) the Data subject can also exercise any rights referred to under paragraph 6 of this Privacy Notice.