



Privacy policy

Time Travel Promotion LP with registered office at 85 Great Portland Street, First Floor, London, W1W 7LT, UK (hereinafter, the "**Data Owner**"), owner of this website (hereinafter, the "**Site**"), as **owner of the treatment of the personal data** of users who browse and participate in the initiative on the Site (hereinafter, the "**Users**") provides below the privacy information pursuant to Personal Data Protection Act – PDPA ACT 26 OF 2012 and its subsequent documents (hereinafter, jointly with the Regulation, "**Applicable Law**").

The Owner, established outside the European Union, offering a service to subjects residing in the European Union, will process the personal data of users who browse and participate in the initiative on the Site pursuant to art. 3, par. 2 lett. a) of the Regulation.

The initiative is reserved for individuals who have completed eighteen years of age. Therefore, the Data Controller does not collect personal data relating to persons under the age of 18. Upon request by the Users, the Data Controller will promptly cancel all personal data involuntarily collected and relating to persons under the age of 18.

The Owner takes the utmost account of the right to privacy and the protection of personal data of its Users. For any information in relation to this privacy statement, Users can **contact the Owner** at any time, using the following methods:

- By sending a registered letter with return receipt to the Data Controller's registered office (85 Great Portland Street, First Floor, London, W1W 7LT, UK)
- By sending an e-mail message to: privacy@timetravelpromotion.com
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1. Purpose of the treatment

Users' personal data will be processed lawfully by the Data Controller pursuant to Personal Data Protection Act – PDPA ACT 26 OF 2012 and its subsequent documents for the following processing purposes:

- Contractual obligations and provision of the service** : to implement the regulation of the prize event, which is accepted by the User during registration; fulfill specific User requests. The User's data collected by the Data Controller for the purpose of possible participation include: name, surname, date of birth, address, house number, city, postal code, e-mail, telephone number, as well as all personal information of the User possibly and voluntarily provided. Unless the User gives the Owner a specific and optional consent to the processing of their data for marketing purposes or for the purpose of communicating data to the Owner's Partners pursuant to article 2 below, the above data will be used by the Owner at the exclusive purpose of ascertaining the identity of the User (also by validating the e-mail address), thus avoiding possible scams or abuses and contacting the User for service reasons only (e.g. managing any participation by the User at the prize event, notify any winnings and manage the phase of attribution and delivery of prizes; contact the User to obtain additional data and information - such as a copy of the identity document - possibly requested by the notary and by the Chamber of Commerce official in charge of the competitions prizes, in order to ascertain their identity and avoid scams and abuses; make any urgent communications by telephone in phase of withdrawal and use of prizes). Without prejudice to the provisions elsewhere in this privacy statement, in no case will the Data Controller make the Users' personal data accessible to other Users.;
- Administrative-accounting purposes** : i.e. to carry out activities of an organisational, administrative, financial and accounting nature, such as internal organizational activities and functional activities for the fulfillment of contractual and pre-contractual obligations;
- Legal obligations** : or to fulfill obligations established by law, by a regulation.

The provision of personal data for the processing purposes indicated above is optional but necessary, since failure to provide them will make it impossible for the User to use the services offered by the Data Controller and participate in the prize event.

The personal data that are necessary for the pursuit of the processing purposes described in this article 1 are indicated with an asterisk within the initiative registration form.

2. Further processing purposes

2.1. **Marketing (sending of advertising material, direct sales and commercial communication)**

With the **free and optional consent of the** User, some personal data of the User (name, surname, date of birth, address, house number, city, zip code, e-mail, telephone number) may be processed by the Data Controller also for marketing purposes (sending of advertising material, direct sales and commercial communication), or so that the Data Controller can contact the User by post, e-mail, telephone (landline and/or mobile, with automated call or call with and/or without the intervention of an operator) and/or SMS and/or other messaging systems, to offer the User the purchase of products and/or services offered by the Owner and/or by third-party companies, present offers, promotions and commercial opportunities.



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Profiling

The User's personal data (i.e. personal and contact details, and information relating to the services in which the User has expressed an interest) may also be processed by the Data Controller for profiling purposes, i.e. to reconstruct the User's tastes and consumption habits, identifying the User's consumer profile, in order to be able to send the User commercial offers consistent with the identified profile.

If consent is not given, the possibility of registering on the Site will not be affected in any way.

In the event of consent, the User may revoke it at any time by making a request to the Data Controller sending an email at privacy@timetravelpromotion.com

User ID verification

The Controller informs that, in the pursuit of its legitimate interest, the User's personal data (i.e. personal and contact details) may also be processed by the Controller for security purposes, i.e. to verify the User's digital identity and to prevent fraud and abuse of personal data.

The User may at any time object to this processing by making a request to the Data Controller sending an email at privacy@timetravelpromotion.com

In case of lack of consent, the possibility of registering for the initiative will not be affected in any way.

In case of consent, the User may revoke it at any time, making a request to the Data Controller in the manner indicated in the following article "Rights of the interested parties" .

The User can also easily oppose further sending of promotional communications via e-mail by clicking on the appropriate link for the withdrawal of consent, which is present in each promotional e-mail. If the User intends to revoke his consent to the sending of promotional communications by telephone, while continuing to receive promotional communications by e-mail, or vice versa, please send a request to the Data Controller in the manner indicated in the following article "Rights of Interested" .

The Data Controller informs that, following the exercise of the right to object to the sending of promotional communications via e-mail, it is possible that, for technical and operational reasons (e.g. formation of contact lists already completed shortly before receipt by of the Holder of the opposition request) the User continues to receive some further promotional messages. If the User should continue to receive promotional messages after 24 hours have passed from exercising the right to object, please report the problem to the Owner, using the contacts indicated in the following article "Rights of the interested parties" .

2.2. Communication of data to the Owner's Partners

With the User's **free and optional consent** , the User's personal data (name, surname, date of birth, address, house number, city, zip code, e-mail, telephone number and IP address) will be communicated from the Owner to the following categories of third-party companies:

- (i) landline and mobile phone companies;
- (ii) companies active in the publishing world (printed paper, internet, television and new media); (iii) companies active in the sector of electronic commerce of products and services;
- (iv) companies operating in the energy sector;
- (v) companies operating in the travel and leisure sector;
- (vi) companies involved in professional and/or educational training;
- (vii) advertising agencies, media centers and contact centres;
- (viii) companies operating in the food sector; (ix) NGOs and ONLUS;
- (x) companies operating in the financial and insurance sector
- (xi) companies operating in the marketing and web communication sector.(collectively ,the “**Partners of the Owner**”).

We and our website sponsors, partners and selected third parties operate in the following areas:

Retail , Automotive, Lifestyle, Charity, Utility, Telecommunications, Insurance, Publishing / Media, Entertainment/Gaming/Leisure, Public Sector, Financial Services, Travel, Mail Order, Health/Beauty, Education, FMCG, Marketing Agencies and Brokers, Property, Pharmaceuticals, Claims Companies and Short Term Loans.

We may share your personal information with our partner WINR Data Pty Ltd (WINR) and their global partners for the purposes of:



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Fraud Prevention - preventing others from misusing your personal information. This may involve identity verification for anti-fraud, anti-money laundering, anti-crime, asset recovery, debt collection and reuniting individuals with unclaimed assets; and

Digital Advertising - providing personalised advertising and content that is relevant to you. This may involve identity resolution for data analysis, matching and linkage.

WINR and their global partners will process and retain your personal information for as long as necessary for these specific purposes and on the lawful basis of legitimate interests.

You can submit a request to exercise any of your privacy rights to the Data Protection Officer at WINR
<https://www.winrdata.com/privacy-policy/>

We may share your data with other third-party partners, which may use such personal data for targeted advertising, measurement, suppression management and identity resolution purposes, including for measurement and analytics on campaign performance, personalization, modelling, onboarding, analysis, profiling and linkage. To extend their databases by appending additional information to existing information they may already hold on you. These organisations will have a relationship with you or may use your data where they have a lawful reason, which may include these organisation's own legitimate interest. Use of your data may also include tracing of individuals, verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering regulations, national security, crime prevention and detection, enforcement, anti-fraud processes, asset recovery and asset reunification, and revenue collection.

When supplying your data with third party partners for purposes including but not limited to online linkage, fraud prevention and tracing, we will rely upon legitimate interests as our legal basis for processing your data.

We use suitable safeguards to transfer your data to third countries such as standard contractual clauses and adequacy decisions to protect your rights. If you would like to receive a copy of our safety measures, you can contact us via email.

These categories include third-party companies that have requested to be explicitly indicated as Partners of the Owner's websites/domains.

The Owner's Partners, as independent data processors, will process the User's personal data for their own marketing purposes (direct sales, sending advertising material and commercial communication), and may contact the User by post, e-mail, telephone (fixed and/or mobile, with automated call or call communication systems with and/or without the intervention of an operator) and/or SMS and/or MMS to offer the User the purchase of products and/ or services offered by the same categories of third-party companies and/or by other companies and presenting offers, promotions and commercial opportunities to the User. Once the transfer has taken place, it will be the responsibility of the Owner's Partner (except for cases in which the Partner is included in the above list and has already made its own information available there), to provide Users pursuant to art. 14 c. 3 of the Regulation, all the information required by the same art. 14 of the Regulation. In case of lack of consent, the possibility of registering for the Initiative will not be affected in any way.

In case of consent, the User may revoke it at any time, making a request to the Data Controller in the manner indicated in the following article "Rights of the interested parties". **Furthermore, it is possible to analytically select for which Partners you intend to give your consent to the transfer of your personal data when registering for the competition.**

The Owner informs that the User's personal data will be processed by the Owner's Partners as **independent data processors**, on the basis of the specific information that will be issued by the Owner's Partners to Users. Any requests not to receive further commercial communications from the Data Controller's Partners, to whom the data have already been communicated by the Data Controller, must therefore be addressed directly to them.

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We share your data or derivatives of your data with third party independent data controllers and processors, including resellers and distributors, for the purposes of identity verification. These third parties provide identity verification services, such as the verification and/or validation of the identity of individuals for the purposes of, but not limited to, anti-money laundering regulations, age verification, anti-fraud processes and pre-employment checks.

3. Marketing Services Providers



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We will share your data with the Marketing Services Providers listed below, who will use it for a variety of direct marketing, testing, research & product development purposes. Marketing Services Providers carry out data profiling. They will combine your data with data they get from other sources (including public sources) and use it to create “predictive models”. Marketing Services Providers use these models to try to predict behaviour and preferences (e.g. how likely you are to buy a holiday online or take a particular type of holiday) or likely circumstances (e.g. whether you are eligible for a particular credit card).

Marketing Services Providers will also try to match and then link your data with data that they receive about you from other sources, to make sure that the data they hold about you is correct.

For example, they might do this to

- check whether you have recently moved address; or
- keep the IP address they hold about you up to date. IP addresses change regularly. The IP address they receive from us might change too quickly to make the data you provide through us useful for marketing purposes. Marketing Services Providers might find it helpful for this to be refreshed from time to time to ensure marketing messages are being delivered to the correct consumers, on the correct device(s).

They share your data, including the profiled data they have created about you, primarily to:

- help organisations better understand the likely characteristics of their customers (and find others like them);
- improve the relevancy and appropriateness of an organisation’s marketing to its customers (e.g. offers, its products and services); and
- help them communicate with their customers more effectively offline and online. This may mean that you receive tailored advertising via direct mail or when you visit a website.

To understand more about the use of your data by Marketing Services Providers, and to find out how to exercise your data protection rights in relation to their use of your data (including how to opt-out), please click through to the websites of the companies below:

4. Legal bases of the treatment

Contractual obligations and provision of the Service (as described in par. 1, letter a)): the legal basis consists in the art. 6, article 1, lett. b) of the Regulation, i.e. the processing is necessary for the execution of a contract of which the User is a party or for the execution of pre-contractual measures adopted at the request of the same.

Administrative-accounting purposes (as described in the previous article 1, letter b)): the legal basis consists in art. 6, article 1, lett. b) of the Regulation, as the processing is necessary for the execution of a contract and/or for the execution of pre-contractual measures adopted at the request of the User.

g obligations (as described in the previous article 1, letter c)): the legal basis consists in the art. 6, article 1, lett. c) of the Regulation, as the processing is necessary to fulfill a legal obligation to which the Data Controller is subject.

Further processing purposes : for the processing relating to *marketing activities* and the transfer of data to third party Partners of the Data Controller (as described in the previous par. 2.1 and 2.2), the legal basis consists in the art. 6, article 1, lett. a) of the Regulation, or the provision by the data subject of consent to the processing of their personal data for one or more specific purposes. For this reason, the Data Controller asks the User for a specific free and optional consent, to pursue this processing purpose.

5. Processing methods and data storage times

The Data Controller will process Users' personal data using manual and IT tools, with logic strictly related to the purposes themselves and, in any case, in order to guarantee the security and confidentiality of the data.

Users' personal data will be kept for the time strictly necessary to carry out the primary purposes connected with the User's participation in the competition and illustrated in article 1 above, or in any case for the time necessary for the protection in civil law of the interests of both Users and of the Owner.

In the case referred to in article 2 above, the Users' personal data will be kept for the time strictly necessary to carry out the purposes described therein and, in any case, until the User revokes his consent. In the case referred to in article 2.1 above, in particular, the Users' personal data will be kept by the Data Controller for the time strictly necessary to carry out the purposes described therein and, in any



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case, for no more than, respectively, thirty-six (36) months from the time of collection and/or receipt of such data. In the case referred to in article 2.2 above, the data retention period by the Partners can be found by **the** User within **the** information provided by the latter.

6. Rights of interested parties

Users will be able to exercise the rights guaranteed to them as per Advisory Guidelines on Key Concepts in the Personal Data Protection Act – PDPA ACT 26 OF 2012 and its subsequent documents, by contacting the Owner in the following ways:

- By sending a registered letter with return receipt to the Data Controller's registered office (85 Great Portland Street, First Floor, London, W1W 7LT, UK)
- └ By sending an e-mail message to: privacy@timetravelpromotion.com

i. Accountability Obligation

Undertake measures to ensure that organisations meet their obligations under the PDPA such as making information about your data protection policies, practices and complaints process available upon request and designating a data protection officer (DPO) and making the business contact information available to the public.

Find out more about the Accountability Obligation.

ii. Notification Obligation

Notify individuals of the purposes for which your organisation is intending to collect, use or disclose their personal data.

iii. Consent Obligation

Only collect, use or disclose personal data for purposes which an individual has given his/her consent to.

Allow the individual to withdraw consent, with reasonable notice, and inform him/her of the likely consequences of withdrawal. Once consent is withdrawn, make sure that you cease to collect, use or disclose the individual's personal data.

iv. Purpose Limitation Obligation

Only collect, use or disclose personal data for the purposes that a reasonable person would consider appropriate under the given circumstances and for which the individual has given consent.

An organisation may not, as a condition of providing a product or service, require the individual to consent to the collection, use or disclosure of his or her personal data beyond what is reasonable to provide that product or service.

v. Accuracy Obligation

Make reasonable effort to ensure that the personal data collected is accurate and complete, especially if it is likely to be used to make a decision that affects the individual or to be disclosed to another organisation.

vi. Protection Obligation

Reasonable security arrangements have to be made to protect the personal data in your organisation's possession to prevent unauthorised access, collection, use, disclosure or similar risks.

vii. Retention Limitation Obligation

Cease retention of personal data or dispose of it in a proper manner when it is no longer needed for any business or legal purpose.

viii. Transfer Limitation Obligation

Transfer personal data to another country only according to the requirements prescribed under the regulations, to ensure that the standard of protection is comparable to the protection under the PDPA, unless exempted by the PDPC.

ix. Access and Correction Obligation

Upon request, organisations have to provide individuals with access to their personal data as well as information about how the data was used or disclosed within a year before the request.

Organisations are also required to correct any error or omission in an individual's personal data as soon as practicable and send the corrected data to other organisations to which the personal data was disclosed (or to selected organisations that the individual has consented to), within a year before the correction is made.

x. Data Breach Notification Obligation

In the event of a data breach, organisations must take steps to assess if it is notifiable. If the data breach likely results in significant harm to individuals, and/or are of significant scale, organisations are required to notify the PDPC and the affected individuals as soon as practicable.

xi. Data Portability Obligation*



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At the request of the individual, organisations are required to transmit the individual's data that is in the organisation's possession or under its control, to another organisation in a commonly used machine-readable format.

7. CHANGES TO THIS PRIVACY POLICY

We may make changes to this privacy policy from time to time. You should check this page regularly to see our most up to date policy. This privacy policy was last updated 02 January 2024.

The Owner is not responsible for updating all the links that can be viewed in this Information, therefore whenever a link is not functional and/or updated, Users acknowledge and accept that they must always refer to the document and/or section of the websites referred to by this link.