

PRIVACY POLICY

Last Updated: 25 January 2019

This Privacy Policy describes how we collect, use, process and disclose your information, including personal data, in conjunction with your access to and use of the website www.italiansabbatical.com (“**Site**”), as well as your participation to the selection procedure to participate to the Italian Sabbatical project organised by Wonder Grottole Impresa Sociale S.r.l. and sponsored by Airbnb (“**Selection**”).

If you see an undefined term in this Privacy Policy, it has the same definition as in the Site Terms of Use and the Selection Rules.

This Privacy Policy does not describe how your data will be processed as Participants in the Sabbatical; once selected, the personal data of Participants in the Sabbatical will be processed by Wonder Grottole and Airbnb, as autonomous controllers, in accordance with the privacy statement provided to you by Wonder Grottole and the [Airbnb Privacy Policy](#), respectively.

Moreover, if you already have or you will create an Airbnb account during the Selection and/or the Sabbatical, Airbnb [Terms of Service](#) and Airbnb [Privacy Policy](#) will apply with respect to any processing of your personal data in conjunction with your access to and use of the Airbnb Platform and the Payment Services (as defined therein).

When this Privacy Policy mentions “**we**,” “**us**,” or “**our**,” it refers to both the following entities, that are jointly responsible for your information under this Privacy Policy, as joint controllers (the “**Controllers**”):

- Wonder Grottole S.r.l. Impresa Sociale with registered office in Grottole (MT), at Rione Vittorio Emanuele no. 5, Italy, which is the organiser of the Selection run through the Site; and
- Airbnb as follows:
 - If your Country of Residence is the United States, the Data Controller is Airbnb, Inc., with registered office in 888 Brannan Street 4th Floor San Francisco, CA 94103 - United States.
 - If your Country of Residence is outside of the United States, the People’s Republic of China (which for purposes of this Privacy Policy does not include Hong Kong, Macau and Taiwan and Japan, the Data Controller is Airbnb Ireland UC), with registered office in the Watermarque Building, South Lotts Road, Ringsend, Dublin 4, Ireland.
 - If your Country of Residence is China (the People’s Republic of China which for purposes of this Privacy Policy does not include Hong Kong, Macau and Taiwan), the Data Controller is Airbnb Internet (Beijing) Co., Ltd, with registered office in 01B, Room 1401, Unit 1, Building 1, No.1 East Third Ring Middle Road, Chaoyang District, Beijing.

- If your Country of Residence is Japan, the Data Controller is Airbnb Global Services Limited , with registered office in 25-28 North Wall Quay, Dublin 1, D01 H104, Ireland.

Please see Section 10 for contact details of the joint Controllers listed above.

1. INFORMATION WE COLLECT

There are three general categories of information we collect:

1.1 Information You Give to Us.

This is the information that you provide to Us by filling in the Application form, as well as the information that you provide to us during the video conference interview(s), if selected among the finalists.

This information is necessary for you to participate in the Selection and for the adequate performance of the agreement between you and us.

If you are selected among the four successful Participants to the Sabbatical, we may use and process your personal data to publicly announce that you have been selected. This information will be processed on the basis of our legitimate interest in announcing the Participants to the Sabbatical.

1.2 Information We Automatically Collect from Your Use of the Site

When you use the Site, we automatically collect information, including personal data, about the services you use and how you use them.

This information is necessary for the adequate performance of the contract between you and us, to enable us to comply with legal obligations and given our legitimate interest in being able to provide and improve the functionalities of the Site.

- **Usage Information.** We collect information about your interactions with the Site such as the pages or content you view.
- **Log Data and Device Information.** We automatically collect log data and device information when you access and use the Site. That information includes, among other things: details about how you have used the Site, IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data and the pages you have viewed or engaged with before or after using the Site.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies, such as web beacons, pixels and mobile identifiers. While you may disable the usage of cookies through your browser settings, the Site currently does not respond to a “Do Not Track” signal in the HTTP header from your browser or mobile application due to lack of

standardization regarding how that signal should be interpreted. For more information on our use of these technologies, see our Cookie Policy below.

2. HOW WE USE INFORMATION WE COLLECT

We use, store and process information, including personal data, about you only for the purposes of running the Selection and to allow you to participate in it; to create and maintain a trusted and safer environment; and to comply with our legal obligations. If you are selected as one of the four successful Participants in the Sabbatical, your personal data will be processed to announce that you have been selected.

3. SHARING & DISCLOSURE

We share and disclose information, including your personal data, with the Selection Committee Members involved in the Selection.

Also, we may disclose your information, including personal data, to courts, law enforcement or governmental authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with our legal obligations; (ii) to comply with legal process and to respond to claims asserted against us; (iii) to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you, or any other of our users to legal liability; (iv) to enforce and administer our Site Terms of Use, the Selection Rules, or (v) to protect the rights, property or personal safety of us, our employees and/or members of the public.

These disclosures may be necessary to comply with our legal obligations or for the purposes of our or a third party's legitimate interest in keeping the Site secure, preventing harm or crime, enforcing or defending legal rights and/or preventing damage.

Where appropriate, We may notify you about legal requests, unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group or create or increase a risk of fraud upon our property or the Site. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify you about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

Finally, we may use third party service providers to help us provide services related to the Site. Service providers may be located inside or outside of the European Economic Area ("EEA"), whether in Europe, India, Asia Pacific and North and South America.

These providers have limited access to your information to perform these tasks on our behalf, and are contractually bound to protect and to use it only for the purposes for which it was disclosed and in accordance with this Privacy Policy.

Laws in these countries may differ from the laws applicable to your Country of Residence. For example, information collected within the EEA may be transferred, stored, and processed

outside of the EEA for the purposes described in this Privacy Policy. Where we transfer store, and process your personal information outside of the EEA we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection. This may be an adequacy decision of the European Commission confirming an adequate level of data protection in the respective non-EEA country or an agreement on the basis of the EU Model Clauses (a set of clauses issued by the European Commission). We will provide further information on the means to ensure an adequate level of data protection on request.

We will need to share your information, including personal data, in order to ensure the adequate performance of our contract with you.

6. YOUR RIGHTS

You may exercise any of the rights described in this section by sending an email to italiansabbatical@gmail.com. Please note that we may ask you to verify your identity before taking further action on your request.

6.1 Rectification of Inaccurate or Incomplete Information.

You have the right to ask us to correct inaccurate or incomplete personal data concerning you.

6.2 Data Access and Portability.

In some jurisdictions, applicable law may entitle you to request copies of your personal data held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

6.3 Data Retention and Erasure.

We retain your personal data for as long as is necessary for the Selection, in accordance with applicable laws. We will delete any information about you promptly after the closing of the Selection phase, which will take place in March 2019, subject to any delay in the Selection phase. If, after the day you submitted the Application form onto the [Site](#), you no longer want us to use your personal data, you can request that we erase your personal data and close your application by sending us an email explicitly indicating this request. Please note that if you request the erasure of your personal data:

- You will not be able to participate to the Selection.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations under applicable law.
- In order to maintain the Site and secure it against accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

6.4 Restriction of Processing.

In some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal data, in particular where: (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing pursuant to section 6.5 and pending the verification whether our legitimate grounds override your own.

6.5 Objection to Processing.

In some jurisdictions, applicable law may entitle you to require us not to process your personal data for certain specific purposes (including certain types of profiling) where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal data for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims.

6.6 Lodging Complaints.

You have the right to lodge complaints about the data processing activities carried out by us before the competent data protection authorities.

8. SECURITY

We are continuously implementing and updating administrative, technical and physical security measures to help protect your information against unauthorized access, loss, destruction or alteration. Some of the safeguards we use to protect your information are firewalls and information access controls. If you know or have reason to believe that your information has been lost, stolen, misappropriated or otherwise compromised or in case of any actual or suspected unauthorized use of your information, please contact us following the instructions in the Contact Us” section below.

9. CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the Site and update the “Last Updated” date at the top of this Privacy Policy. Any changes will become immediately effective upon posting. If you disagree with the revised Terms, you shall cease using the Site and, if you have already submitted your Application form, you must terminate your agreement with us by [notifying us](#) of such and requesting to withdraw your Application, in which case you will not be included in the Selection. If you do not terminate your agreement with us before the date the revised Privacy Policy becomes effective, your continued access to or use of the Site will constitute your acceptance of the revised Privacy Policy.

10. CONTACT US

If you have any questions or complaints about this Privacy Policy or our information handling practices, you may email us or contact us at: italiansabbatical@gmail.com.

COOKIES POLICY

We use cookies and similar technologies to help provide, protect and improve the Site. This policy explains how and why we use these technologies and the choices you have.

A cookie is a small data file that is transferred to your device (e.g. your phone or your computer). For example, a cookie could allow us to recognize your browser, while another could store your preferences. There are two types of cookies used on the Site: (1) “session cookies” and (2) “persistent cookies.” Session cookies normally expire when you close your browser, while persistent cookies remain on your device after you close your browser, and can be used again the next time you access the Site (if your next visit is within a relatively short time known as the “cookie window”).

Why We Use These Technologies

We use these technologies for a number of purposes, such as:

- To enable you to use and access the Site.
- To enable, facilitate and streamline the functioning of and your access to the Site.
- To better understand how you navigate through and interact with the Site and to improve the Site.
- To monitor and analyze the performance, operation and effectiveness of the Site.
- To enforce legal agreements that govern use of the Site.
- For fraud detection and prevention, and investigations.
- For purposes of our own customer support, analytics, research, product development and regulatory compliance.

Third Parties - Google Analytics

To help us better understand how people use the Site, we work with Google Analytics. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out Browser by clicking [here](#).

To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the [Google Ads Settings page](#). To the extent advertising technology is integrated into the Site and you opt-out of tailored advertising, you may still receive advertising content. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of these opt-out links and are not responsible for the availability or accuracy of these mechanisms.

Your Choices

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help section of your browser's toolbar.

Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the [Adobe website](#) and make changes at the [Global Privacy Settings Panel](#).

Your mobile device may allow you to control cookies through its settings function. Refer to your device manufacturer's instructions for more information.

If you choose to decline cookies, some parts of the Site may not work as intended or may not work at all.