

Promoting entity

Grandi Navi Veloci S.p.A. (hereinafter "GNV") with registered office in Calata Marinai d'Italia - 90146 Palermo (Italy) and operating office in Via Balleydier 7 - 16149 Genova (Italy), Italian tax code and VAT number 13217910150, registered with the Chamber of Commerce of Palermo R.E.A. No. 268303.

Area

The initiative will take place in the Italian territory.

Type and name

"MyGNV"

Duration

The initiative will last from 1st May 2020 to 30th April 2021.

Spending vouchers must be requested and used by 30th April 2023.

Purpose

To promote the GNV ferry services by rewarding customer loyalty.

Beneficiaries

All passengers registered with the MyGNV fidelity card.

Adhesion

GNV organises this initiative to reward participants by granting them spending vouchers in the form of GNV discounts, as specified in the table below. The spending vouchers can be earned by purchasing GNV ferry tickets until reaching the total points indicated in the table below.

To adhere to the initiative, the customers must be registered with or sign up for the MyGNV fidelity card.

Registration is free and can be made by any passenger.

After completing the registration process correctly and logging in for the first time, the participants will receive an e-mail with the participation code identifying them in the programme. On making a purchase, this code can be used to transform the purchase value into credits which can be cumulated to obtain the relevant spending vouchers.

The participants can access a private Web session via the Internet in the www.gnv.it website, where they can view the rules of the initiative and the points accumulated through ticket purchases, or modify their data and deregister from the initiative.

Each participant is responsible for communicating, within maximum 30 days from the ticket purchase date, any errors in the points crediting procedure, also due to the incorrect allocation of the personal code.

Points collection procedure

To collect points, the participants must request – when making a purchase – the GNV ticket to be associated with their participation code. The accumulated value is recognised on the basis of the value paid and only if the purchased service was actually used.

The points will be credited only once the trip has been made.

Structured tickets, such as options and pre-sales tickets, are excluded from the points accumulation system.

The value of the ticket will be converted into points according to the following ratio:

1 point equal to 10 Euro of tickets purchased.

Points can be associated with the participation code on the same date of issue of the ticket through all channels.

Points can also be associated after this date and within 30 days from the date of the trip, exclusively through the MyGNV reserved area (mygnv.gnv.it).

The points will only be tallied once the journey terminates. Therefore, if the ticket is cancelled or not used, no points will be accumulated.

The spending vouchers can only be requested if one of the thresholds has been reached.

To be considered valid, the holder of the tickets must be the holder of the MyGNV card.

The credits in points are assigned to the single participation code and are calculated by taking into account the expense made net of any collections of spending vouchers by the customer, discounts, refunds, etc.

The same person cannot participate with multiple codes. Moreover, the points earned through the association of the participation code with the ticket are personal, therefore they cannot be exchanged or transferred between different subjects.

To ensure the initiative can take place, GNV implements a dedicated information system that counts the ticket purchases made with the participation code and updates the points total whenever spending vouchers are collected.

To obtain the benefits offered by the programme, the holders of the rights must keep their original tickets purchased and used and submit them on request.

GNV reserves the right to arrange, during the course of the current initiative, any additional promotional activities aimed at favouring the participants. These may include, in particular, extending the duration of the initiative and introducing supplementary spending vouchers or more favourable conditions for the participants.

In general, these conditions will be notified to the participants through the advertising material made available by GNV on the website www.gnv.it and in the private Web session reserved for each participant.

Request for spending vouchers

Once the relevant points thresholds have been reached, the participant may request the desired spending voucher consisting in a discount, as shown in the table below.

Following the request, GNV will run checks to verify the correctness of the tickets that generated the relevant credit.

The spending vouchers are issued by means of a code in the user's reserved area or through the Contact Centre.

The spending vouchers must be requested at least 5 working days before the departure date.

For any other type of information, customers may write to the following e-mail address: mygnv@gnv.it.

The spending vouchers can be collected by the entitled subjects once they reach the points total corresponding to the desired threshold and can be requested at any time by 30th April 2023.

Spending vouchers

The spending vouchers consist in discounts that can be used to purchase GNV ferry tickets. The participants can use the spending vouchers once they reach the points thresholds indicated below:

Points threshold	Prizes
200 points	€ 50.00 spending voucher
400 points	€ 100.00 spending voucher
600 points	€ 150.00 spending voucher
800 points	€ 200.00 spending voucher
1,000 points	€ 250.00 spending voucher
1,200 points	€ 300.00 spending voucher
1,400 points	€ 350.00 spending voucher

The discounted ticket will be issued by GNV after verifying the seat availability. The ticket will then be sent via e-mail.

GNV will allow all participants who have collected points up to 30/04/2020 during the past initiative to carry forward any points still available. In other words, these points will be aligned to the new thresholds according to a conversion factor, so the customer can retain the amount of the spending voucher accrued up to that date.

The points thus converted can be used up to 30/04/2023.

The spending voucher does not apply to any taxes applied to the ticket.

Only one spending voucher can be used for each ticket. The spending vouchers described above cannot therefore be cumulated nor can they be cumulated with other spending vouchers and/or discounts issued through the coupon code.

The spending voucher can also be used to purchase tickets with a value below that of the accumulated voucher; in this case, the spending voucher will not entitle the holder to any change and the remaining amount cannot be used for further purchases.

Moreover, the participants will not be entitled to the re-crediting of points if the ticket they were used for is cancelled.

Any spending vouchers not used by the specified deadlines will not be subject to extensions or re-issue.

In addition, the spending voucher:

- cannot be split and must be used for a single payment;

- cannot be refunded or converted into cash;
- is strictly personal;
- cannot be transferred in any way behind payment to third parties by the participants. The promoting company reserves the right to carry out the relevant checks;
- cannot be cumulated with any other promotional initiatives launched by GNV, unless otherwise specified by the latter.

All aspects pertaining to the ticket and the transport are subject to the rules in force appearing under the "Transport Terms and Conditions" of GNV.

Processing of personal data

Pursuant to art. 13 of the European Regulation 2016/679 and Legislative Decree no. 196/2003, as referred to by Legislative Decree no. 101/2018, Grandi Navi Veloci S.p.A., as Data Controller, will process the personal data provided by the customer at the time of registration to the fidelity card Mygnv in compliance with current legislation and the principles of fairness, lawfulness, transparency and protection of confidentiality.

As part of the membership of the MYGNV loyalty program, the processing of data will be aimed at carrying out the following activities:

- a) issuance of the Loyalty Card and management of activities not exercisable anonymously and necessary to allow subscribers to enjoy and recognize discounts and promotions, participation in points collections and access to other ancillary services usable through the Card;
- b) carrying out, with the express written consent of the customer, direct marketing activities, such as sending - by e-mail, SMS and MMS or non-automated tools, such as paper mail and telephone with operator - advertising and communication material with information and/or promotional content in relation to products or services provided and/or by the owner
- c) carrying out, with the express written consent of the customer, individual or aggregate profiling activities and market research aimed, for example, at the analysis of consumption habits and choices, the compilation of statistics on them or the assessment of the degree of satisfaction with respect to the products and services proposed.

For the purposes referred to in point a) of the previous point, the provision of data is optional, but is a necessary and indispensable condition for the issuance of the Loyalty Card: Failure to provide the card therefore makes it impossible for the applicant to obtain it.

For the purposes referred to in points b) and c) above, the provision of data is optional and any refusal to provide such data and to give consent implies the impossibility for the Owner to follow up the direct marketing and profiling activities indicated therein, but does not affect the possibility for the owner to obtain the issue of fidelity card and get benefits related to it

The data processing will be carried out by personnel directly employed by the Data Controller and/or by natural or legal persons specifically identified by the latter as being in charge of the processing.

The data provided will in no case be subject to disclosure or disclosure to third parties, without prejudice to persons whose right to access the data is recognized by law or by orders of the authorities as well as the subjects, including external and/or foreign, of which the Owner makes use for the performance of activities instrumental and/or ancillary to the management of the Loyalty Card and the provision of services and

benefits related to it, including software solutions providers, web application and storage services also provided through Cloud Computing systems specifically used for this purpose.

The Personal Data will be stored by the Data Controller, for a period equal to the duration of the initiative and in any case no later than the terms provided by the Law.

The Data Controller may be obliged to keep the Personal Data of the customer for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the customer's Personal Data will be deleted. Therefore, upon expiry of this period, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

The EU Regulation 2016/679 confers on the interested parties the rights provided by art. 15 to art. 21 of the GDPR, as well as the right to submit a complaint to the competent Authority pursuant to art. 77 of the GDPR.

In particular, in relation to the processing of personal data, data subjects have the right to request GNV, access, rectification, cancellation, limitation, opposition and portability; in addition, they may lodge a complaint with the Supervisory Authority, that in Italy is the Guarantor for the Protection of Personal Data.

Interested parties can send a formal request to exercise their rights or a report of alleged non-compliance or violation, by sending an e-mail to: dpo@gnv.it

Please note that the general privacy policy can be consulted in an extended and updated form at the link <https://www.gnv.it/images/pdf/it/privacy.pdf>.

Other

GNV reserves the right to modify, even partially and at any time, the operating procedures and method of participating in the initiative, by publishing such changes on the website www.gnv.it and in the private Web sessions reserved for each participant.

Exclusion of the regulation governing spending voucher events

Pursuant to Art. 22-*bis* of (Italian) Legislative Decree no. 91/2014, inserted during the conversion from Law no. 116/2014 and amending Art. 6, Par. 1, of Presidential Decree no. 430/2001, the concept of spending voucher competitions and operations excludes 'events in which, with regard to a specific expense, with or without access threshold, the spending vouchers consist of vouchers to be used for a subsequent purchase in the same point of sale that issued said vouchers or in another point of sale of the same trade name or company'.

Firm date

In order to define the firm date of these rules, we hereby declare that the latter have been signed with digital signature and marked pursuant to the Digital Administration Code – Legislative Decree no. 82 of 7th March 2005 and subsequent amendments.