

## PRIVACY AND PERSONAL DATA PROCESSING

### Privacy notice within the meaning of art. 13 of European Regulation 2016/79 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data

So.Ge.Del S.r.l., with registered office in Via G. Fabbroni, 68, Florence (FI) Italy, Tax Code and VAT no. 05050120483 (hereinafter, "Controller"), in its capacity of data Controller, informs you, pursuant to art. 13 of Regulation (EU) no. 2016/679 (hereinafter, "GDPR") that your data will be processed lawfully, fairly and transparently with the methods and for the purposes set out below:

#### 1. Purposes and methods of data processing.

Your personal data ("Data") are acquired – as part of the regular So.Ge.Del. S.r.l. business – for the following purposes: a) to purchase and to confirm your reservation of accommodation and accessories services, particularly in order to fulfil the legal obligations for contracts, accounting and fiscal topics, and generally to provide the requested services; b) to fulfil the obligation, foreseen by the Italian "Public security laws unique text" (art. 109 R.D. 18.6.1931 n. 773 and following modifications), that obliges us to communicate to the Police Headquarters, for public security reasons, the details of the clients staying at our Residence, following the rules of the Ministry of internal affairs ("Decreto" 7 January 2013 and following modifications); c) offer, promotion and/or sell of stay/overnight stay/services/experiences/touristic packages and of eventual partner firms, made through traditional communication ways or automatized systems (for ex. newsletters), particularly sending updated information on purchased products.

1.1 Your data are acquired by the Controller directly from the data subjects, and are processed:

A) without your explicit consent (art. 6 b) - f), GDPR), for the following Purposes: - to enter into contracts for the services offered by the Controller; - to fulfil pre-contractual and tax obligations deriving from the company's relationships with you; - to comply with obligations laid down by law, regulations, European law or orders issued by the Authority (e.g. on anti-money laundering); - to protect the vital interests of the data subject or of another natural person; - for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child; - to exercise the Controller's rights, for example the right of defence in Court;

B) with your prior, specific and separate consent, for the following Purposes:

- to send you by email, mail and/or SMS text messages and/or phone calls, any newsletters, business communications and/or advertising material on products or services offered by the Controller and for customer satisfaction surveys about the quality of the services offered, with the related exercise of profiling activities;

- to send you by email, mail and/or SMS text messages and/or phone calls, any business and/or promotional communications of third parties (e.g. business partners).

1.2 Personal data are processed using manual, electronic, computerised and telematic tools, with logics that are strictly connected with the said purposes and, in any case, in compliance with the precautions, guarantees and necessary measures required by the applicable rules, designed to ensure the confidentiality, integrity and availability of Data and to avoid any material or non-material damages (e.g. loss of control over personal data or limitation of rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage). Personal data are processed on the basis of the data held by the Controller and with your commitment to report promptly any correction, addition and/or update.

You may withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of previous processing operations.

The Controller, as far as necessary to pursue the purposes set out in paragraph 1, may acquire data which are defined by the Regulation as special data (e.g. data revealing racial or ethnic origin, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation). As set out in article 9 of GDPR these special data may be processed:

i) with the Data Subject's explicit consent; ii) where processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject; iii) where processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; iv) where processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects; v) where processing relates to personal data which are manifestly made public by the data subject; vi) where processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity; vii) where processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject; viii) where processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to article 9, paragraph 3, GDPR; ix) where processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy; x) where processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89, paragraph 1, based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

In any case, any special data acquired will be processed in strict accordance with the Regulation and with any general and special measures adopted in this respect by the Supervisory Authority and, in any case, with the utmost confidentiality. Special data may not be disseminated and may communicated to third parties solely to pursue the declared purposes and in accordance with the obligations of confidentiality indicated above.

The Controller will process personal data for the time necessary to fulfill the purposes referred to above and in any case for no more than 10 years from termination of the relationship for Service and Marketing Purposes. Upon expiry of this period, the Data will be cancelled or transformed into anonymous form, unless they need to be kept to meet statutory obligations or to fulfil orders issued by Public Authorities and/or Supervisory Bodies.

## **2. Nature of data supply.**

Without prejudice to the data subject's personal autonomy, the supply of data indicated as required in the form is strictly necessary to achieve the purposes referred to in paragraph a) point 1.1.

## **3. Consequences of refusal to provide personal data.**

The refusal to supply data indicated as required will result in: the impossibility to establish or continue the relationship, or to carry out given operations, if your data are necessary to perform the relationship or the operation; the impossibility to carry out given operations that require the communication of data to subjects that are functionally related to the performance thereof; the non-communication of data to subjects who engage in further activities, not functionally related to performance of the relationship.

## **4. Access to, communication and dissemination of data.**

The personal data collected with the methods described herein may be communicated to parties related to the Controller, in particular to public Entities and Authorities, Controller's professionals and/or consultants, in order to fulfil statutory obligations. People in charge of processing requests may acquire knowledge of such data. The said data shall not be disclosed.

## **5. Data transfers**

Personal data are stored on physical or virtual servers, either internal or external, or on paper archives located at the registered office of the Controller and/or by subjects that collaborate with the Controller. In so far as necessary to achieve the purposes referred to in paragraph 1, the Data Subject's data may be transferred abroad to Countries/organisations outside the EU which ensure an adequate level of protection according to the European Commission or in any case on the basis of other appropriate safeguards, such as a contract or the Standard Contractual Clauses adopted by the European Commission for countries that do not ensure an adequate level of protection. A copy of any Data transferred abroad and the list of Countries/organisations outside the EU to which Data have been transferred, can be requested to the Controller by using the contact details referred to in paragraph 8 below.

## **6. Nature of data supply and consequences of the refusal to answer.**

6.1 The supply of data for the purposes referred to in art. 1.1A) is required. In their absence, we will be prevented from ensuring the Services referred to in art. 1.1A).

6.2 The supply of data for the purposes referred to in art. 1.1B) is optional. You may thus decide not to supply any data or may subsequently refuse the processing of data previously supplied; in this case, you will not receive any SMS text messages, newsletters, business communications and advertising material concerning the Services offered by the Controller. In any case, you will continue to be entitled to receive the Services referred to in art. 1.1A).

## **7. Rights of the data subject**

In your capacity of data subject, you may exercise the rights granted by art. 15 GDPR, specifically the rights:

- i. to obtain confirmation as to whether or not personal data concerning you are being processed, even if not yet recorded, and their communication in an intelligible form;
- ii. to obtain information on: a) on the source of your personal data; b) the purposes and methods of processing; c) the logics applied in case of electronic processing; d) the identity details of the Controller, processors and the designated representative; e) the subjects or categories of subjects to whom personal data may be communicated or who may acquire them in their capacity of designated representative in the State territory, processors or persons in charge;
- iii. you may obtain: a) the updating, rectification or, where interested therein, the integration of data; b) the cancellation, transformation into an anonymous form or blocking of data processed against the law, including those whose storage is not necessary for the purposes for which the data were collected or subsequently processed; c) the confirmation that the operations described in letters a) and b) of point iii), have been brought to the knowledge, even as regards their content, of those to whom the data have been communicated or disseminated, unless this proves impossible or it involves a manifestly disproportionate effort compared to the protected right;
- iv. you may object, in whole or in part: a) on legitimate grounds, to the processing of your personal data, even where pertaining to the purpose of collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for market surveys or commercial communications using automated call systems without an operator, emails and/or traditional marketing methods (phone and/or mail). It should be noted that the data subject's right of objection, set out in point b) above, for the purpose of direct marketing using automated methods, extends to traditional ones; in any case, it does not prejudice the data subject's right to object even only in part. Therefore, the data subject may decide to receive only communications using traditional methods or only automated communications or none of the two types of communication. Where applicable, the data subject has the rights granted by art.s 16-21 GDPR (Right to rectification, right to erasure, right to restriction of processing, right to data portability, right to object), as well as the right to lodge complaints with the Supervisory Authority.

The rights in question may be exercised, also through a representative of the data subject, by sending a request to the Controller, by registered letter or email, to the registered email address [sogedel.srl@pec.it](mailto:sogedel.srl@pec.it).

## **8. Controller and Processors**

The Controller is: So.Ge.Del. S.r.l., acting through its legal representative, Giovanni del Grosso domiciled for his office at the registered office of the Company in Via G. Fabbri n. 68 – 50134 Florence (FI) Italy, Tax Code and VAT no. 05050120483. The up-to-date list of processors and persons in charge of processing is kept at the registered office of the Controller. The Controller has not appointed a Data Protection Officer since it is not required to do so.

Fully informed pursuant to art. 13 of European Regulation 2016/79 on the processing of my personal data, in accordance with art. 23 thereof:

Name: \_\_\_\_\_

Surname: \_\_\_\_\_

Date of birth: \_\_\_\_\_

mobile: \_\_\_\_\_

e-mail: \_\_\_\_\_

• As regards the processing of my personal data above indicated (required):

give my consent

do not give my consent

• As regards the processing of my data for profiling and marketing activities:

give my consent

do not give my consent

• As regards the sending of advertising material and business and/or promotional communications and for customer satisfaction surveys about the quality of the services offered via newsletters;

give my consent

do not give my consent

Date.....

Signature of the data subject.....