

## **INFORMATION ON THE PROTECTION OF PERSONAL DATA**

### **EU Regulation 2016/679 "General Data Protection Regulation"**

Dear user,

In this document, Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas (hereinafter "Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas" or the "Data Controller") informs you of how the information contained on the website <http://www.sarnaresidence.it/> is managed, with reference to the processing of personal data of users who consult it. This information is provided pursuant to art. 13 of EU Regulation 2016/679 "General Data Protection Regulation" (hereinafter "Regulation") to those who access the website.

#### **1. Identity and contact details of the data controller.**

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The data controller pursuant to Articles 4, no. 7) and 24 of the Regulation is Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas with registered office in Strada Comunale di Ripa D'Orcia, SNC – 53027 San Quirico D'Orcia (SI) whose contact details are:

- Telephone: +39 0577 898307
- Fax: +39 0577 898307
- Email address: [info@sarnaresidence.it](mailto:info@sarnaresidence.it)

#### **2. Definition of personal data and information relating to processing activities**

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Pursuant to the Regulation, personal data means: *any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.*

For the purposes of this disclosure, your personal data will be collected directly from you; the processing will concern the following categories of data:

- Browsing data: The computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of internet communication protocols. This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes the IP addresses or domain names of computers used by users connecting to the site, the URI ( Uniform Resource Identifier ) addresses of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), and other parameters relating to the user's operating system and IT environment.
- Common data: sending communications via email to the addresses indicated on the website or in the "Contacts" section or the "Availability Request" section entails the subsequent acquisition of the sender's address as well as any other personal data entered.

In any case, the Data Controller undertakes to ensure that the information collected and used is appropriate for the purposes described in the following paragraph and that this does not result in an invasion of your personal sphere.

#### **3. Purpose of the processing for which the personal data are intended.**

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Your personal data will be processed by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas for the following purposes:

1. management of your requests for information forwarded via the email addresses indicated on the website;
  2. management of your requests for information forwarded through the "Contacts" section;
  3. management of your requests for information sent via the "Availability Request" section;
  4. obtain statistical information on the use of services (most visited pages, number of visitors per time slot or day, geographical areas of origin, etc.);
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5. verify the effectiveness and correct functioning of the site in an exclusively aggregated and anonymous form.

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#### **4. Legal basis for processing and legitimate interest.**

Personal data processed for purposes 1), 2), and 3) are voluntarily provided by you; by sending a message via email or using the forms in the "Contact" and/or "Availability Request" sections, you expressly accept the website's privacy policy. Personal data processed for purposes 4) and 5) will be processed based on the Data Controller's legitimate interest in verifying the effectiveness and proper functioning of the website in order to implement any corrective and/or improvement measures.

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#### **5. Any recipients or categories of recipients of the personal data.**

Pursuant to the Regulation, data processing will be based on the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, and storage limitation. Data processing will be carried out by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas using appropriate technical and organizational measures to ensure the integrity, confidentiality, and availability of your data using paper, electronic, IT, and telematic tools. Employees of Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas may access your personal data, in accordance with the principle of necessity and in their capacity as data processors. These individuals have been provided with specific instructions and are required to maintain the confidentiality of your data.

Your personal data may be disclosed, in compliance with the law, to:

- suppliers, professionals, and/or companies of the Data Controller, to the extent necessary to carry out their duties and subject to obtaining adequate guarantees that impose on them the duty of confidentiality and security (e.g., marketing, website maintenance, etc.);
- Public authorities may access the data to fulfill all obligations established by law, regulations, and EU legislation for the purpose of carrying out activities aimed at preventing or suppressing cybercrime.

Your personal data will not be disclosed. The updated list of data controllers is available by writing to the contact details provided in this policy (section 1 "Identity and contact details of the data controller").

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#### **6. Transfer of personal data to a third country or to an international organisation.**

Your personal data will be processed at the headquarters of Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas and the Web Hosting data center and will not be transferred to a country outside the European Economic Area or to an international organization .

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#### **7. Period of retention of personal data.**

Personal data for purposes 1), 2), and 3) will be retained for the time strictly necessary to manage the information and services you have requested. Personal data for purposes 4) and 5) will be deleted immediately after processing. Any submission of data defined as "sensitive" by the Regulation (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as the processing of genetic data, biometric data intended to uniquely identify a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation) and/or relating to criminal convictions and offenses will result in the immediate deletion of the data unless the data subject provides written consent to their processing by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas.

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#### **8. Mandatory data communication.**

Providing your personal data for purposes 1), 2), and 3) is optional. Providing Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas with your personal data requested at various times may be necessary to achieve the purposes identified above, or it may be optional.

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#### **9. Consequences of failure to communicate such data.**

Failure to provide your data marked as mandatory will make it impossible to achieve the purpose of the specific data collection. Providing Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas with additional data, other than that marked as mandatory, is optional and will not have any consequences in terms of achieving the purpose of the data collection.

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#### **10. Automated decision-making and profiling.**

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Your personal data will not be subjected to automated decision-making.

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#### **11. Rights of the interested party.**

Pursuant to Articles 15, 16, 17, 18, 20, 21, and 22 of the Regulation, we inform you that you, as a data subject, have the right to request from the Data Controller access to your personal data and the rectification or erasure of such data, restriction of processing, or to object to such processing, as well as the right to data portability. Any rectification, erasure, or restriction of processing carried out at your request (unless this proves impossible or involves a disproportionate effort) will be communicated by the Data Controller to each recipient to whom the personal data has been disclosed. The Data Controller may inform you of these recipients upon your request. The exercise of your rights is not subject to any formal requirements; it will be sufficient for you to send a clear communication regarding the right you intend to exercise to the contact details provided in this notice (section 1 "Identity and contact details of the data controller"). We inform you that Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas has implemented a procedure to manage requests from interested parties.

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#### **12. Withdrawal of consent.**

Pursuant to Article 7, paragraph 3 of the Regulation, we inform you that you remain free to withdraw your consent at any time, without prejudice to the lawfulness of processing based on consent before its withdrawal, by sending a clear, informal communication to this effect to the contact details provided in this policy (section 1 "Identity and contact details of the data controller"). Upon receipt of such a request, the Data Controller will promptly remove and delete the data from the archives and databases used for processing and will inform any third parties to whom the data has been disclosed for the same deletion purposes. We inform you that Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas has an active procedure for managing the withdrawal of consent upon request of data subjects.

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#### **13. Right to lodge a complaint.**

Pursuant to Article 77 of the Regulation, we inform you that if you believe that the processing of your personal data violates the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), following the procedures and instructions published on the Authority's official website ( [www.garanteprivacy.it](http://www.garanteprivacy.it) ).

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#### **14. Links to other websites**

The website <http://www.sarnaresidence.it/> may contain links to other websites that may have no connection to Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas. The Data Controller does not control or monitor these websites or their content and cannot be held responsible for the content of these sites or the policies they adopt, including with respect to your privacy and the processing of your personal data while browsing. We therefore ask you to exercise caution when accessing these sites via links on our website and to carefully read their terms of use and privacy policies. The Privacy Policy of Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas does not apply to third-party websites; our website provides links to these sites solely to facilitate user searches and navigation and to facilitate Internet connections to other sites. The activation of the links does not imply any recommendation or recommendation by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas for accessing and browsing these sites, nor any guarantee regarding their contents, services or goods that may be provided and sold by them to Internet users.

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#### **15. Social plug-ins**

The website <http://www.sarnaresidence.it/> may contain social media plug-ins. If you access one of our web pages featuring such a plug-in, your browser connects directly to the social media platform, and the plug-in appears on your screen thanks to the browser connection. Before using these plug-ins, we invite you to consult the privacy policies of the social media platforms themselves, on their official pages.

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