

PRIVACY AND COOKIE POLICY

RT4 Società semplice Agricola, owner of Agriturismo “La casa vecchia”, legally established in Marsciano (Pg) Fraz. Morcella Voc. Pozzo n 21 (P.I. 03510920543) in persona as the owner Mrs. Roberta Riganelli, born in Marsciano (Pg) on 29/05/1978 (C.F. RGNRRT78E69E975C) afterwards called “owner”, as controller, informs you that the present Privacy Policy and Cookie Policy was prepared in accordance with Regulation UE n. 679/2016 (afterwards GDPR) , with any applicable national law and legislation of the personal data protection authority of 8th May 2014.

Within the Society users’ personal data are processed by the staff members of the company as persons authorised to process. (afterwards “ handlers”). The handlers operate under the direct authority of the controllers of processing personal data.

The present Privacy Policy and Cookie Policy describe how we collect, use and share the personal data that we obtain in the following ways.

- Effects of using the site www.casavecchia.eu (afterwards “the site”) by the users or
- Provided to the Society by a third party previously and specifically authorised by you, as owner, to the processing of your personal data, giving your approval for the disclosure to third parties for promotional, commercial and marketing purposes.

The disclosure is for the above mentioned site and doesn’t include other sites possibly consulted by the user through dedicated link.

SUBJECT OF PROCESSING

1. PERSONAL DATA

the personal data undergoing processing from the Società RT4-Agriturismo “la Casa Vecchia” are the following:

name, surname, birth date, sex, contact number, residency, post code, telephone number, email address.

In case we collect these personal data directly from you and through our site, the system stores the IP address of the network used by you in the moment of subscribing, to enable us to keep evidence of registration of your consent.

Furthermore, in case your data came from other indirect sources (for example , if we got your data from a third party), this source communicated to us, together with your data, also the IP address you used in the moment in which you specifically agreed about releasing your data to third parties for promotional, commercial and marketing purposes.

The registration of the IP address of your network in the moment you express your agreement can be useful to the competent authority in order to carry out survey activity or follow up considered suitable in your interest and against all illegal acts committed by third parties using your data.

2. INTERNET HISTORY

The computer systems and the software processes responsible for the functioning of the Site acquire, during their normal operating, some personal data which transmission is implicit in the use of communication protocols of the internet. This is information which isn't collected to be associated with identified interested parties, but which could , by its very nature, through elaboration and association with data from third parties, identify the users. This category of data includes IP addresses or the domain names of the computers utilized by the users who connect to the site, the URI addresses (Uniform Resource Identifier) of the required resources, the time of the request, the applied method to submit the request to the server, the dimension of the file achieved in response, the numeric code indicating the answer from the server (success, error, ecc.) and other parameters concerning the operating system and the IT environment of the user. These data, except for the IP address of the network used by you in the moment of the subscription, for which is valid the specification of the previous point n 1, are used for the sole purpose of obtaining anonymous statistical information regarding the use of the site and to control the correct operating and will be deleted immediately after the elaboration.

3. COOKIES

Cookie are small pieces of information that is placed on your device (PC, tablet, ecc.) when you are visiting certain websites. The cookies then are resend to the original website during every subsequent browsing, or are send to a different website which is able to identify that specific cookie. Cookies work as a memory for a web site, allowing the web site to recognise your device every subsequent time you visit that site. Furthermore cookies make it possible to memorise your browser

preferences offering you a more functional experience of the site, ensuring that the content of the site is as much personal as possible. Cookies can be used both by the owner of this site and third parties.

We use the following types of cookies:

technical cookies which do not require approval

technical cookies are used with the sole purpose to carry out the transmission of a communication on a network for electronic communication or to transmit to the provider information strictly necessary to Spafid Connect to provide a service specifically requested by the user.

They are not used for further purposes and are normally installed by the owner or manager of the web site. They are divided in:

Browser cookies or session cookies: they guarantee the normal browsing and use of the web site; they are actually necessary for the correct functioning of the site.

Analytics cookies: similar to technical cookies where used directly by the manager of the site to gather information in aggregated form on the number of users and how they visit the site, with the purpose to improve the performance of the site.

Functional cookies: they allow the user the browsing on the basis of a number of selected criteria (for example, language, ..) in order to improve the service.

All the technical cookies do not require agreement, but only disclosure requirement, hence they are installed by default in the moment you access the site.

No personal data of the users is acquired in this matter by the site. Cookies are not used to transmit personal information, nor are any sort of persisting cookies used, meaning systems that can trace the users. The use of session cookies (which are not memorised in persisting way on the computer of the user and are by default deleted when the browser is closed) is strictly limited to the transmission of sessional identifiers (composed of random numbers generated by the server) necessary to enable a secure and efficient exploration of the site.

The session cookies that are used in this site avoid the use of other computer technologies which are potentially damaging for the browsing

privacy of the users and they do not allow the acquisition of personal identifying data of the user.

4. DATA VOLUNTARILY PROVIDED BY THE USER.

The optional, explicit and voluntary submission of the e-mail address to the addresses indicated on this site implies the subsequent acquisition of the address of the sender, necessary to reply to the requests, as well as possible other personal data included in the letter.

The processing of the above mentioned personal data is only for the purpose to permit our society, controller, to answer questions, doubts, requests for clarification, or to gather suggestions of the users.

These data will not be subject of distribution and will be acknowledged by the employees of our society specifically authorised to treat them, being in charge of or performing.

The legislation on privacy (artt. 15-22 of the regulation) gives you the right to access at all times, the data that concerns you, as well as to rectify a/o integrate, if not correct or incomplete, to delete them or to limit the use, if there are the assumptions, to oppose the processing for reasons to do with your particular situation, to the portability of the data provided, where processed automatically for the contractual services required by you, within the limits of the Regulation (art. 20)

Summery informative specifications will be provided and visualised on the pages of the site will be drawn up for specific on-demand services.

The user is free to provide personal data reported in the request forms or anyhow indicated in the contacts with the company office to urge the submission of information material or other notifications. The lack of providing them may cause the impossibility to obtain the request.

LEGAL BASE AND PURPOSE OF PROCESSING

1. Promotional, commercial and marketing purposes

After obtaining your explicit permission (unless the society legally obtained your data from a controller who received previously and specifically your permission for promotional, commercial and marketing purposes, including disclosure to third parties), the processing of data

will happen to achieve the purposes and to send, always only by the Society, on a regular basis, offers, discounts and or other commercial initiatives of the Society or of our commercial partners.

The lack of providing permission for these purposes will not allow you to receive these offers, discounts e/o commercial communications. The Society specifies that accepting the processing for the promotional, commercial and marketing purposes, your data will not be shared by any third party. In fact, in absence of your specific approval, the Society never shares your data with the operators who make use of the same services to distribute their own commercial offers. Furthermore, even if you decide to accept the processing of your data for the specified purposes, you will have anyhow the right to object, in full or in part, the processing for the mentioned purposes, making a simple request to the Society, without any formalities, to the addresses in the footnotes of this information.

2. Communication to third parties for promotional, commercial and marketing purposes.

Obtaining your explicit consent (unless the Society legally obtained your data from the controller who previously and specifically obtained your permission for promotional, commercial and marketing purposes, including the communication to third parties), your data can be used by the Society in order to communicate them to third parties (as pointed out at “ recipients of the data”) to send commercial communication (marketing) a/o direct sale on their own initiative or that of their partners, by email, fax, telephone, sms and any other distant communication technology - inclusive communication through social media.

The approval for the processing of your data for this specific data purpose is absolutely optional and your eventual refuse for the processing shall not affect in any way the possibility to continue to receive communications about the above mentioned purposes.

Furthermore, even if you decide to accept the processing of your data for the specified purposes, you will have anyhow the right to object, in full or in part, the processing for the mentioned purposes, making a simple request to the Society, without any formalities, to the addresses in the footnotes of this information.

CONTROLLER AND HANDLERS

1. Controller

The controller of the data provided by the user is the Society, as was above defined, as in the person of its legal representative pro tempore.

2. Handlers

The employees of the Society, or other outside persons, specific and compliant responsible, may come to the knowledge of your data because responsible of the execution of certain processing operations connected to and instrumental to provide the service a/o for the other purposes allowed by you.

MODALITIES OF THE PROCESSING

The processing of your personal data will take place using manual or electronic equipments, through procedures that are strictly linked to the above mentioned purposes and anyhow, in order to ensure the safety, the protection and the privacy of the data.

Moreover, we specify further that the processing of the private data is executed with modalities which reduce to the minimum the risk of destroying or losing, also by accident, the data, of non authorised access or not permitted procedure and not according to the purposes of the collection. Particularly, in the processing of data, the Society will make use of organisational measures, physical and logical, appropriate to ensure the safety and the privacy of the data, with the use of every suitable action to enable and guarantee the classification, the storage and the privacy of the data (for example only, regular control, custody in locked cupboards, fire protection, continued power supply, customer identification, antivirus control, regular back-up, ecc.)

The personal data can be processed by employees, assistants and contractor of the Society, specifically appointed to process the data, to

perform specific operations necessary to achieve the mentioned purposes, under the direct authority and responsibility of the Society and in accordance to the instructions issued by the same.

RECIPIENT OF THE DATA

The data can be shared, expressing previously your agreement, and only for the above mentioned purposes, in the categories of operating parties in the following economical/product groups:

services and products regarding the communication and technology sector and similars

free time: pay t.v., publishing, sport, collectibles, photography, pursuits, games, transport, navigation, tourism, (hotel, tour operator, travel agencies, air companies, ecc.), aerospace, gardening, hobbies, lottery, contests, communication and entertainment, art, music and similars.

Distribution and commerce: agri-food, supermarkets, drinks and similars.

Communication and services: publicity agencies, marketing, events, consultancy, advertising, PR, publicity dealerships, media centres, telecommunications, market research, agencies furniture marketing and similars.

Ecology and environment: building, civil engineering, and real estate products/services: constructions, decorations, house, design, real estate agencies and similars

Trade fairs and events, and similars

Information technology, internet, e-commerce sites, etc.

Particularly, apart from this product list, as of now we point out that your data, in case of specific agreement to the purpose of communication processing a/o disposal to others for promotional, commercial and marketing purposes, will be communicated to third societies who will use them according to provided separate disclosures , for example, through communication by email address.

For the sake of completeness, we inform you that in some case these companies, in their capacity of independent controllers, may prefer to write you directly and inform you in detail about their way how they handle your data, what opportunities they have planned for you and how you can exercise your rights against them. These parties, acting all as independent controllers, after submission of appropriate disclosure to the person concerned, will handle your data with the purpose of promotional , commercial and marketing communications, by email, fax, telephone, sms and every other distance communication technology, notwithstanding your right to object in any moment the processing for these purposes, making a simple request without any formality to the concerning controller.

DATA RETENTION PERIOD

The controller uses the personal data for as long as necessary in order to carry out the purposes above mentioned and anyhow not longer than 10 years from the ending of the connection for the service purposes and not longer than 2 years from the collection of data regarding all the other purposes.

In accordance with the art. 5 paragraph 1 point e) of the Reg. UE 2016/679 the personal data that are collected will be anyhow stored in a form which allows the identification of those concerned for a period of time not exceeding the achievement of the purposes for which the data was collected.

YOUR RIGHTS

As data subjects, the following rights shall be recognised on the collection of personal data and processed by the controller when treating as above outlined.

1. Right to access

You have the right to receive confirmation from the Society whether or not personal data concerning him or her are being processed and, where that is the case, access to the personal data and the following information: (i) the purposes of the processing (ii) the categories of personal data in question; (iii) the recipients or categories of recipients to whom your personal data are or will be communicated, particularly if the recipients are third countries or international organisations; (iv) if possible, the retention time of the personal data foreseen or, if not

possible, the methods used to determine that period; (v) the right to lodge a complaint with the supervisory authority.

2. Right of rectification, objection and erasure

You have the right to obtain the rectification of your incorrect personal data that concerns you as well as, considering the purposes of the processing, the right to integrate the incomplete personal data, also providing a complementary statement. Furthermore, you have the right of erasure of personal data concerning you where one of the following grounds applies (i) personal data are not necessary anymore in relation to the purposes for which they are collected or otherwise processed; (ii) data have been unlawfully processed; (iii) the agreement based on which the holder had the right to process your data has been revoked and there is no other legal basis which allows the holder to process the data; (iv) you are opposed to the data-processing and there is no overriding legitimate ground; (v) personal data should be erased in order to comply with a legal obligation.

The Society is entitled however to disregard the pursuit of those rights of erasure if prevails the right to freedom of expression and information meaning for the performance of a legal obligation or to defend his legal rights. At all times, it may object to the processing of data even for only one of the purposes for processing above mentioned.

3. Right to data portability

You are entitled to receive in a structured format, commonly used and legible your personal data provided to the Society and handled on the base of agreement, as well as the right to transmit these data to another controller indicated by you without any obstacle.

RIGHT OF RESTRICTION OF PROCESSING

You have the right to obtain from the Society the restriction of processing: (i) for a period enabling the controller to verify the accuracy of the personal data concerning you and of which you objected the correctness; (ii) in case of unlawful processing of personal data; (iii) when there's the requirement for your data to be established, exercise or defence of legal claims; (iv) the period necessary to establish the verification with regard to the possible prevailing of the legal motivation of the holder concerning your request in opposition to processing.

You can exercise the rights mentioned above contacting the Society through the contact details indicated in the following point.

At last, we remind you that you are granted the right to contact the data protection authority in the event you consider there has been a processing that infringes your data.

CONTACT DETAILS OF THE SOCIETY

You can exercise your rights at any time, by application to be sent to the Society acting as controller by e-mail, info@casavecchia.eu