Privacy Policy of www.hotelletegnue.it

This Website collects some Personal Data from its Users.

Owner and Data Controller (Art. 4 para. 7 GDPR)

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Types of Data collected

Among the types of Personal Data that this Website collects, by itself or through third

parties, there are: Cookies, Usage Data and email address.

Complete details on each type of Personal Data collected are provided in the dedicated

sections of this privacy policy or by specific explanation texts displayed prior to the

Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected

automatically when using this Website.

Unless specified otherwise, all Data requested by this Website is mandatory and failure

to provide this Data may make it impossible for this Website to provide its services. In

cases where this Website specifically states that some Data is not mandatory, Users are

free not to communicate this Data without consequences to the availability or the

functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to

contact the Owner.

Any use of Cookies, or of other tracking tools, by this Website or by the owners of

third-party services used by this Website serves the purpose of providing the Service

required by the User, in addition to any other purposes described in the present

document and in the Cookie Policy (<a href="https://www.hotelletegnue.it/en-gb/cookie-policy">https://www.hotelletegnue.it/en-gb/cookie-policy</a>).

Users are responsible for any third-party Personal Data obtained, published or shared through this Website and confirm that they have the third party's consent to provide the Data to the Owner.

### Mode and place of processing the Data

## Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

## Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing "opt-out", without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

• processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

#### Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

#### **Retention time**

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

#### Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the

User has given consent to such processing, as long as such consent is not withdrawn.

Furthermore, the Owner may be obliged to retain Personal Data for a longer period

whenever required to do so for the performance of a legal obligation or upon order of an

authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to

access, the right to erasure, the right to rectification and the right to data portability

cannot be enforced after expiration of the retention period.

The purpose of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as

well as for the following purposes: Displaying content from external platforms,

Interaction with external social networks and platforms, Remarketing and behavioral

targeting, Analytics, Tag Management, Handling payments and Managing landing and

invitation pages.

Users can find further detailed information about such purposes of processing and about

the specific Personal Data used for each purpose in the respective sections of this

document.

**Detailed information on the processing of Personal Data** 

Personal Data is collected for the following purposes and using the following services:

**Analytics** 

The services contained in this section enable the Owner to monitor and analyze web

traffic and can be used to keep track of User behavior.

Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc.

that connects data from the Facebook advertising network with actions performed on

this Website.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States

Privacy Policy (<a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>)

Privacy Shield participant.

**Google Ads conversion tracking (Google Inc.)** 

Google Ads conversion tracking is an analytics service provided by Google Inc. that

connects data from the Google Ads advertising network with actions performed on this

Website.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States

Privacy Policy (<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>)

Privacy Shield participant.

Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google

utilizes the Data collected to track and examine the use of this Website, to prepare

reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own

advertising network.

This integration of Google Analytics anonymizes your IP address. It works by

shortening Users' IP addresses within member states of the European Union or in other

contracting states to the Agreement on the European Economic Area. Only in

exceptional cases will the complete IP address be sent to a Google server and shortened

within the US.

In connection with this website, the Google Signals service is also used as an extension

of Google Analytics 4. Google Signals collects visitor data from your website in Google

Analytics and links it to Google information from accounts of registered users. These

must have previously agreed to such a connection in order to receive personalized

advertising. The visitor data may include the end user's location, search history,

YouTube history and data from Google partner websites.

It is used to provide aggregated and anonymized statistics on user behavior across

devices.

Personal Data collected: Cookies and Usage Data

Place of processing: United States

Privacy Policy (<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>)

Opt Out (<a href="https://tools.google.com/dlpage/gaoptout?hl=en">https://tools.google.com/dlpage/gaoptout?hl=en</a>)

Privacy Shield participant.

### Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Website in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

# Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States

Privacy Policy (<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>)

Privacy Shield participant.

#### **Interaction with external social networks and platforms**

This type of service allows interaction with social networks or other external platforms directly from the pages of this Website.

The interaction and information obtained through this Website are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

### Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States

Privacy Policy (<a href="https://www.facebook.com/privacy/explanation">https://www.facebook.com/privacy/explanation</a>)

Privacy Shield participant.

Remarketing and behavioral targeting

This type of service allows this Website and its partners to inform, optimize and serve

advertising based on past use of this Website by the User.

This activity is performed by tracking Usage Data and by using Cookies, information

that is transferred to the partners that manage the remarketing and behavioral targeting

activity.

In addition to any opt out offered by any of the services below, the User may opt out of

a third-party service's use of cookies by visiting the Network Advertising Initiative opt-

out page (https://optout.networkadvertising.org/).

Google Ads Remarketing (Google Inc.)

Google Ads Remarketing is a remarketing and behavioral targeting service provided by

Google Inc. that connects the activity of this Website with the Ads advertising network

and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States

Privacy Policy (https://policies.google.com/privacy?hl=en)

Opt Out (<a href="https://www.google.com/settings/ads/onweb/optout">https://www.google.com/settings/ads/onweb/optout</a>)

Privacy Shield participant.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly

from the pages of this Website and interact with them.

This type of service might still collect web traffic data for the pages where the service is

installed, even when Users do not use it.

Widget Video YouTube (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows

this Website to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: Italy

Privacy Policy (<a href="https://policies.google.com/privacy?hl=en">https://policies.google.com/privacy?hl=en</a>)

Privacy Shield participant.

## **Google Fonts (Google Inc.)**

Google Fonts is a typeface visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States

Privacy Policy (<a href="https://www.google.com/intl/policies/privacy">https://www.google.com/intl/policies/privacy</a>)

Privacy Shield participant.

# **Google Maps widget (Google Inc.)**

Google Maps is a maps visualization service provided by Google Inc. that allows this Website to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States

Privacy Policy (https://www.google.com/intl/policies/privacy)

Privacy Shield participant.

### The right of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.

- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their
  Data and ask for it to be updated or corrected.
- Restrict the processing of their Data. Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

# Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

### How to exercise their rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

#### Additional information about User's Personal Data

# Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Website or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

#### Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Website may provide the User with additional and contextual information concerning Services or the collection and processing of Personal Data upon request.

### System log and maintenance

For operation and maintenance purposes, this Website and any third-party services may collect files that record interaction with this Website (System logs) use other Personal Data (such as the IP Address) for this purpose.

### Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

## How "Do Not Track" requests are handled

This Website does not support "Do Not Track" requests.

To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

## Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Website and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

# **Definitions and legal references**

## Personal Data (or Data)

Personal information is any information that, directly or indirectly, even in connection with any other information, including a personal identification number, makes an individual identified or identifiable.

#### **Usage Data**

The information collected automatically through this Website (also from third-party Websites integrated in this Website), including: the IP addresses or domain names of the computers used by the User that connects with this Website, the addresses in URI notation (Uniform Resource Identifier), the time of the request, the method used in forwarding the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response from the server (successful, error, etc.) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details of the itinerary followed within the Website, with particular reference to the sequence of the pages consulted, to the parameters relating to the operating system and the IT environment of the user.

#### User

The individual who uses this Website which, unless otherwise specified, coincides with the interested party.

### **Interested party**

The physical person to whom the Personal Data refers.

## **Data Processor (or Manager)**

The physical person, legal person, public administrator and any other entity that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

# **Data Controller (or Owner)**

The physical or legal person, public authority, service or other body that, individually or together with others, determines the purposes and means of processing personal data and the instruments adopted, including security measures relating to the functioning and the use of this Website. The Data Controller, unless otherwise specified, is the owner of this Website.

#### This Website

The hardware or software tool through which Users' Personal Data are collected and processed.

#### **Service**

The Service provided by this Website as defined in the relevant terms (if any) on this site.

# **European Union (or EU)**

Unless otherwise specified, any reference to the European Union contained in this document is intended to be extended to all current member states of the European Union and the European Economic Area.

#### Cookie

Small portion of data stored in the User's device.

#### Legal references

This privacy statement is drafted on the basis of multiple legislative orders, including articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement applies exclusively to this Website.

Updated Privacy Policy as of July 10, 2023