

Privacy Policy – Information Notice to Website Users/Visitors regarding the Processing of Personal Data

This notice is provided to inform users/visitors about the principles governing the use, security, and confidentiality of personal data provided when using our web services.

This page describes how the website operates in terms of processing the personal data of users/visitors who access it. This information is provided in accordance with EU Regulation 2016/679 (GDPR) and applicable data protection laws to those who interact electronically with the services of this website, starting from the address *www.mediterraneosorrento.com*.

This privacy notice applies exclusively to the websites *www.mediterraneosorrento.com* and *book.mediterraneo.com* (collectively referred to as *mediterraneosorrento.com*). It does not apply to third-party websites that may be accessed by the user through links provided on this site.

Data Controller and Location of Data Processing

The website *mediterraneosorrento.com*:

- is owned by Hotel Mediterraneo S.r.l., operating as Hotel Mediterraneo, VAT no. 01342761218. Personal data processing related to the management of services and requests submitted via the website is carried out at the company's operational headquarters at Corso Marion Crawford 85, Sant'Agnello (NA), by authorized internal personnel. As the Data Controller, Hotel Mediterraneo S.r.l. is committed to complying with applicable data protection laws;
- is maintained for content management purposes by NOZIO Srl, Via delle Industrie 17/A, Venice Marghera;
- is hosted at Amazon Technologies Inc. in Virginia, U.S.A., where processing related only to technical services takes place.

Other external parties who may have access to the personal data on the website, where applicable, will be appointed as data processors by the data controller or will act as independent data controllers, depending on the nature of the processing. An up-to-date list of data processors is available upon request from the data controller.

For data transferred outside the European Economic Area, the safeguards provided for in Articles 44 and following of the GDPR are applied.

Users/visitors are required to read this notice carefully before submitting any personal information or completing any electronic form on the website. By visiting *mediterraneosorrento.com*, users implicitly accept the practices described in this privacy policy.

Purpose and Legal Basis of Processing

Personal data provided by users/visitors as part of requests and/or the use of services managed through the website are used solely to respond to such requests and/or manage the service and are disclosed to third parties only when necessary. The legal basis for this processing is the necessity to respond to the data subject's request or to manage a specifically requested service (GDPR Art. 6(1)(b)).

If users/visitors provide their consent, their data may also be used for marketing communications regarding additional services offered by the Data Controller. In such cases, the legal basis is the data subject's freely given consent (GDPR Art. 6(1)(a)).

All other browsing data is retained for the period strictly necessary for processing, within the limits allowed by law.

Types of Data Processed and Purpose of Processing

- **Browsing Data**

The IT systems and software procedures used to operate this site acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified individuals, but could, by its nature and through processing and association with data held by third parties, enable users to be indirectly identified (e.g., IP addresses, domain names, operating systems, browser types, timestamps). This data is used only for anonymous statistical purposes and to monitor site functionality. It is stored for a limited time and is not shared or disseminated.

- **Data Voluntarily Provided by Users/Visitors**

When users/visitors voluntarily and explicitly submit personal data to request services, subscribe to mailing lists, or make inquiries via the website, this results in the acquisition of such data. These data are processed solely to fulfil the request or provide the requested service and may only be disclosed to third parties when necessary for this purpose.

- **Cookie-Related Data**

Cookies are small text strings that websites store on users' devices to enhance their browsing experience and, in some cases, to monitor their usage. Some cookies may be sent back to the same websites during subsequent visits by the same user, allowing the site to recognize them and improve its functionality, for example, by speeding up navigation or displaying content more relevant to the user based on previous choices. While browsing a website, users may also receive cookies on their devices from different sites or web servers, known as "third-party" cookies.

Mediterraneosorrento.com uses two types of cookies:

- Session cookies: to enable secure and efficient navigation, detect the user's country, maintain login status, and allow registration and account access. These are not permanently stored and are deleted when the session ends.
- Persistent cookies: to personalize browsing based on the user's device (desktop, tablet, smartphone), analyze website access, and enable content sharing via social networks or email. These are stored on users' devices and may have variable durations.

Upon first access, a cookie banner allows users to accept, refuse, or manage cookie preferences by category (technical, statistical, profiling, third-party). For more information, see the Cookie Policy available on the homepage, compliant with the Italian Data Protection Authority's Guidelines dated June 10, 2021.

Third-Party Websites

The Controller may integrate or refer to third-party services on the website. These third-party sites operate independently and may adopt their own privacy policies. Therefore, the Controller disclaims any liability regarding their content or data processing practices.

Provision of Data

Except as specified for browsing data, users/visitors are free to choose whether or not to provide their personal data. However, failure to provide certain information may make it impossible to deliver the requested services.

Processing Methods and Data Retention

Each processing activity is carried out using automated tools (e.g., electronic systems) and/or manual methods (e.g., paper-based), in accordance with applicable legislation, and for the time strictly necessary to achieve the purposes for which the data were collected:

- Browsing data: up to 30 days
- Cookies: as specified in the Cookie Policy
- Request-related data (e.g., via contact forms): until the request is fulfilled
- Profiling preferences (with consent): up to 7 years
- Marketing purposes (with consent): until deletion is requested

The website does not employ automated decision-making processes or profiling that produce legal effects or significantly affect users.

Appropriate technical and organizational security measures are in place to prevent data loss, misuse, or unauthorized access (GDPR Art. 32).

Data Subject Rights

Data subjects have the right, at any time and under the conditions established by Articles 15–22 of the GDPR, to obtain confirmation as to whether personal data concerning them are being processed and, if so, to access the data and the following information:

- purposes of processing;
- categories of personal data involved;
- recipients or categories of recipients, particularly if located outside the EU or part of international organizations;
- expected retention period or criteria for determining it;
- source of the data (if not collected directly from the data subject);
- existence of automated decision-making, including profiling.

Data subjects also have the right to request:

- rectification of inaccurate data;
- completion of incomplete data;
- erasure of data (where legally permitted);
- restriction of processing;
- lodging a complaint with a supervisory authority.

The Controller shall notify each recipient of any rectification, erasure, or restriction unless this proves impossible or involves disproportionate effort.

Additionally, data subjects have the right to receive their personal data in a structured, commonly used, machine-readable format and to transmit such data to another controller without hindrance.

Requests should be addressed to the Controller via email at: *info@mediterraneosorrento.com*. Data subjects may also contact the Hotel's *Data Protection Officer (DPO)*, appointed under Art. 37 of the GDPR, via: *dpo.mediterraneo@figurati.it*.

This document, published at *www.mediterraneosorrento.com* in August 2025, constitutes the Privacy Policy of this website and may be updated periodically. The use of collected information is subject to the policy in effect at the time of use.