

# PRIVACY POLICY – HOTEL LE SORGENTI S.r.l.

PURSUANT TO ARTICLES 13 AND 14 OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 AND ITALIAN LEGISLATIVE DECREE 196/2003 AND SUBSEQUENT AMENDMENTS AND ADDITIONS

During browsing of this website, personal information and data may be collected, as indicated in this Privacy Policy. This Privacy Policy refers exclusively to this website.

## **Data Controller**

The Data Controller is **HOTEL LE SORGENTI S.r.l.**, VAT no./tax code 02936690243, with registered office at Via Acque 6, 36050 Bolzano Vicentino (VI), Italy. To exercise the above-mentioned rights, users may contact the Data Controller on the telephone number +39 0444 355010 or at the email address [info@hotellesorgenti.com](mailto:info@hotellesorgenti.com)

The Data Controller has not identified a Data Protection Officer (DPO), as it is not subject to the obligation to appoint one under Article 37 of the Regulation.

## **Type of data processed and purpose of processing**

### *Browsing data*

The computer 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 data category includes IP addresses or domain names of computers and other devices used by users, URI/URL (Uniform Resource Identifier/Locator) addresses of the resources requested, time of the request, method used to send the request to the server, size of the file obtained in response, numeric code showing the status of the response data from the server (successful outcome, error, etc.), and other parameters regarding the user's operating system and computer environment.

This data, which is necessary for use of the web services, is processed for the purpose of:

- obtaining statistical information on use of the services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.);
- checking correct operation of the services offered.

Browsing data is not retained for more than seven days (except in the case of criminal investigations by judicial authorities).

### *Data disclosed by the user*

Optional, explicit and voluntary sending of messages to the Data Controller's contact addresses, private messages sent by users to profiles/pages on social media (where this possibility is provided for), and completion and submission of forms on the Data Controller's Site, entails the acquisition of the sender's contact details, which are necessary in order to respond, and all personal data included in the communications.

Provision of some of the data subject's personal data is mandatory in order to use the services requested, and failure to provide such data may prevent access to these. Mandatory personal data is marked with an asterisk. If certain data is indicated as not mandatory, the data subject is free to refrain from communicating that data, without this having any consequence on the availability of the service or its operation.

Data subjects who have any doubts as to the data required are encouraged to contact the Data Controller.

In particular, data may be collected through:

### The 'INFORMATION REQUEST' web page

Via the 'INFORMATION REQUEST' web page, users' personal data may be communicated to the Data Controller.

Users are asked not to provide non-relevant personal data. and non-relevant personal data will, in any case, be deleted or disregarded.

Data sent via the Form will be processed for the sole purpose of responding to users' requests, based on the pre-contractual relationship between the parties.

### The 'BOOK NOW' web page

When visiting the 'BOOK NOW' page, the user will be redirected to the booking engine in order to make the booking. For further information, please refer to the privacy information provided on that site.

### Cookies and other tracking systems

For details, please see the cookie policy provided on this website.

### **Legal basis for processing**

The legal basis for the processing is as follows:

- processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to Article 6, paragraph 1, letter c) of EU Regulation 2016/679;
- processing is necessary to pursue the legitimate interest of the Data Controller or third parties, pursuant to Article 6, paragraph 1, letter f) of EU Regulation 2016/679;
- processing is necessary on the basis of a contract to which the data subject is party or the execution of pre-contractual measures taken at the request of the data subject, pursuant to Article 6, paragraph 1, letter b) of EU Regulation 679/2016;
- processing is carried out on the basis of the data subject's expression of consent, pursuant to Article 6, paragraph 1, letter a) of EU Regulation 2016/679.

However, the Data Controller may be requested to clarify the concrete legal basis of each processing operation and, in particular, to specify whether the processing is based on the law or on a contractual or pre-contractual relationship.

### **Processing methods**

Data is processed by the appointed company personnel and is not disclosed to unauthorised third parties.

Processing is performed using computer and/or telematic tools and in automated and/or manual mode, in compliance with the provisions of Article 32 of GDPR 2016/679 on security measures, by specially appointed persons and in compliance with the provisions of Article 29 of GDPR 2016/679.

The Data Controller adopts appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of personal data.

In addition to the Data Controller, in some cases, other subjects involved in provision of the services offered and in organisation of this website (hosting providers, IT companies, filing, collection, printing and mailing companies, communication agencies, postal couriers) may have access to the data, in addition to external persons appointed, if necessary, by the Data Controller as Data Processors. The updated list of Data Processors can always be requested from the Data Controller.

### **Transfer of personal data**

Data is processed at the Data Controller's operating headquarters and at any other location of the parties involved in its processing. For further information, please contact the Data Controller.

The data subject's personal data will not be transferred outside of the European Union.

### **Retention period**

In compliance with the principles of lawfulness, restriction of purposes and data minimisation, pursuant to Article 5 of GDPR 2016/679, the data subject's personal data will be retained for the time necessary to achieve the purposes for which it is collected and processed or to defend/exercise a right.

Where processing is subject to the data subject's consent, the Data Controller may retain the personal data longer until such consent is revoked. Furthermore, the Data Controller could be required to retain the personal data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the personal data will be deleted. For this reason, on completion of the said period, the right to access, deletion, rectification and portability of the data may no longer be exercised.

### **Rights of the data subject**

Pursuant to Articles 15 to 22 of Regulation (EU) 2016/679, the data subject may, at any time, exercise the right to:

- a) request confirmation of the existence or otherwise of their personal data;
- b) obtain information on the purposes of processing, the categories of personal data and the recipients or categories of recipients to whom the personal data is or will be disclosed and, where possible, the retention period;
- c) obtain data rectification and deletion;
- d) obtain restriction of processing;
- e) obtain data portability, i.e., receive the data from a data controller in a structured, commonly used and machine-readable format and transfer it to another data controller without hindrance;
- f) object to processing at any time; data subjects are reminded that, if their data is processed for direct marketing purposes, they may object to processing without justification.
- g) ask the data controller for access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
- h) withdraw consent at any time without prejudice to the lawfulness of processing based on the consent given prior to withdrawal;
- i) lodge a complaint with a supervisory authority. The data subject has the right to lodge a complaint with the Italian Data Protection Authority (*Garante per la Protezione dei Dati Personali*), based in Rome at Via di Monte Citorio 121 (tel. +39 06696771), following the procedures and instructions published on the Authority's website at [www.garanteprivacy.it](http://www.garanteprivacy.it)

**Data Controller contact details**

Please use the contact details below to contact the Data Controller:

- by email, at: [info@hotellesorgenti.com](mailto:info@hotellesorgenti.com)

by telephone: +39 0444 355010

- by regular mail: Via Acque 6, 36050 Bolzano Vicentino (VI), Italy

LAST UPDATED 02/08/2022