

# **PRIVACY**

Privacy - Information pursuant to EU Regulation 2016/679 ("GDPR") art. 13 and D.Lgs. 196/2003 amended by D.Lgs. 101/2018

Dear User, in compliance with the Personal Data Protection legislation, with this document we want to provide the information necessary overalls on the processing of your personal data held by Fornella Srl,we ask you to read it carefully and contact us if in doubt.

# 1 - What kind of data do we collect?

When you access this website, you agree that the process owner FORNELLA Srl independently collect certain personal information. This page is designed to tell you what information we collect, why and howwe use them.

We treat two types of data:

- user-supplied data
- data that we collect automatically

# Information you provide

When you access our website www.fornella.it and you decide to make a reservation, check-in online or request a contact with Fornella SRL ask you to provide certain information by filling out the contact form, which are used to process your request and provide you with services.

Personal Data Collected common, according to the service requested may include: name, address, date ofbirth, identification number of a valid ID, email address, telephone number, VAT number, company name and internal reference.

Data that automatically collect:

- technical data: for example, IP address, browser type, data regarding the current location (approximate) of the instrument you are using any third-party services used by it may collect systemlogs, which are files that record the interactions and may also contain data personal, such as IP address User.
- Data collected by using cookies or similar technologies: For more information, please visit the "Cookies" section.

# Third-Party Data

If you provide personal information to third parties, such as those of your family members or friends, you must be sure that these individuals are adequately informed and gave their consent to data processing inthe manner described in this declaration and lifting the holder of the data from communications and treatments not authorized.

If you are under 16 years you can not provide any personal information or you can send an email and, in anycase, do not assume liability for any drop us statements you provide. If we noticing the existence of false statements will proceed with the immediate deletion of any data acquired personnel.

#### 2 - Purpose of the processing

We use your information to:

- a. establish a first contact with Fornella SRL (precontractual measures art. 6 par. 1 lett. b)
- b. make a reservation, check-in online to use our services. (Execution of the contract Art. 6 par. 1 lett. B)
- c. Send you commercial communications via e-mail, sms and telephone
- d. Signing up our newsletter

# 3 - The provision of data is required?

The provision of personal data is required exclusively for the purpose of a) and b), the refusal for service



delivery purposes makes it impossible to use the same service and sending the request for contact and / orreservation; for the purposes c) and d) is optional and the consent to the treatment may be revoked at any time, without affecting the legality of the processing carried out up to that moment, by writing an email toprivacy@fornella.it.

#### 4 - Legal Treatment Base

The Holder is Personal Information relating to the person in if one of the following conditions:

- the user has given their consent for one or more particular purposes; Note: In some jurisdictions theHolder may be entitled to process Personal Information without your consent must exist or another of the legal bases specified below, as long as the user does not object ("opt-out") to such treatment. This is not, however, apply if the processing of Personal Information is governed by European legislation on protection of personal data;
- the treatment is necessary to the execution of a contract with you and / or the execution of pre-contractual measures;
- the treatment is necessary for compliance with a legal obligation to which the Controller is subject;
- the treatment is necessary for the execution of a task of public interest or for the exercise of publicpowers of which is invested with the Holder;
- the treatment is necessary to achieve the legitimate interest of the Owner or third parties.

You can always request to the Holder to clarify the concrete legal basis of each treatment and in particular specify whether treatment is based on the law, as provided by a contract or necessary to conclude a contract.

#### 5 - Treatment of Subjects

The data controller: Fornella s.r.l. Via Fornella, 1, San Felice, 25010, BS, VAT no. 01725540981 Tel036562294 Email fornella@fornella.it

Remember that you can at any time send questions or requests regarding your personal data and respectfor your privacy writing to privacy@fornella.it

Categories of those concerned: Users of the site, potential customers and clients

# 6 - Persons to whom the data may be disclosed

The data collected as part of service may be disclosed to the following recipients:

companies which perform functions closely related and instrumental to the technical service, such as suppliers who provide server housing, web hosting, internet networks, appointed external managers and guarantee and accept responsibility for the processing of your data in accordance with the rules dictated byart. 28 GDPR; organizations and administrative and judicial authorities by virtue of legal obligations (eg. "services housed" the State Police) employees and contractors of Fornella Srl, professionals, consultants, event planners. The updated list of recipients can be requested from the Data Controller. Under no circumstances will we give or sell personal information to third parties.

# 7 - How and for how long will be stored your data?

The storage of personal data will be in print / electronic / IT and for the time strictly necessary to the fulfillment of the purposes of paragraph 2, with respect for your privacy and regulations.

Data relating to your email and other data provided at the time of first contact request, purpose a) are stored for up to 15 days after they are sent; for the purposes b) until the completion of the same or in any case until compliance with the legal obligations (art.2220 cc art. 2948 cc); for the purposes c) for two years; for the purpose d) up to withdrawal of consent.

At the end of the retention period, the Personal Information will be deleted. Therefore, at the expiration of that period the right to access, cancellation, rectification and the right to data portability will no longer be exercised.



## 8 - How to ensure the protection of your data?

The data is processed by authorized persons, duly trained and committed to confidentiality, as shown in therelevant legislation, especially with regard to adequate safety measures provided GDPR (art. 32) for treatment by means of computer and automated tools and strictly related to the purposes set out in paragraph 2 and in any case designed to prevent access, disclosure, alteration or unauthorized destruction of Personal data.

## 9 - Location of the processing and data transfer

The data will be processed in the offices of the data controller and external managers duly appointed for theservices essential to the operation of the site and the provision of Fornella Srl services process. We do not transfer extra-EU data, however some service providers to which we we support, in order to fully fulfill the contract or to provide services requested by you can transfer data to non-EU countries in compliance with the legislation applicable as per art. from 44 to 49 GDPR. Power at any time request further information regarding treatment and possible third countries subject of data transfer locations.

10 - How can you have information about the data, edit, delete or get a copy? What are your rights? (Art.15 to 22)

Any natural person using our service can exercise the following rights:

- obtain from the holder, at any time, information about the existence of their personal data, the
  originof the same, the scope and methods of treatment and, if present, to gain access to
  personal information and the information referred to 'Article 15 of GDPR;
- require updating, rectification, integration, cancellation, limitation of data processing in the case
  of the conditions provided for in Article 18 of GDPR, transformation into anonymous form or
  blocking of personal data processed in violation of the law, including those for which it is not
  necessary to keep in relation to the purposes for which the data were collected and / or
  subsequently processed;
- object, in whole or in part, for legitimate reasons, the processing of data pertinent to the
  purpose of the collection and processing of personal data provided for the purposes of
  commercial informationor sending of advertising material or commercial communication. Every
  user has other ensure the right to withdraw consent at any time without affecting the
  lawfulness of the processing based on consent given before the revocation;
- get their personal information, consciously and actively provided or through the use of the service, ina structured format, common and readable by automatic device use, and send it to another data controller unimpeded;
- submit a complaint to the supervisory authority for the protection of personal data (for ItalianAntitrust Authority)
   We remind you that for any related question or request your personal data and respect for your privacy, you can write to privacy@fornella.it, there Your application will be evaluated to ensure thatthere are the terms of the law, in any case will be sent a reply with our assessments.

# 11- Interaction with external social networks and platforms

This type of service allows for interactions with social networks, or other external platforms directly from thepages of this site interactions and information obtained from this website are in any case subject to the User's privacy settings to each social network .In the event that a service interaction with social networks is installed, it is possible that, even if the users do not use the service, the same collect traffic data on pages where it is installed.

The Site may include links to websites, plug-ins and third-party applications. If you access to other Web sites from links provided on the Site, the operators of such websites may collect or share user information. This information will be treated according to the privacy policies of those sites, which may differ from this Privacy Policy. Fornella Srl can not control third-party websites, we recommend that



you read the privacy policy posted on such sites in order to understand their procedures for collecting, processing and dissemination of personal data; it is possible that, even if the users do not use the service, the same collecttraffic data on pages where it is installed.

List Social Widgets and you can interact with the site: Vacation, TripAdvisor, HolidayCheck; that list may besubject to change, so we recommend you to watch this document regularly to stay informed.

# 12 - More information on the treatment

The User's Personal Data may be used by the owner in court or in the preparatory stages leading to possible legal defense against improper use of this application or related services by the User. The Userdeclares to be aware that the owner may be required to disclose the information by order of public authorities.

The Data Controller reserves the right to make changes to this privacy policy at any time by giving information to users on this page and, if possible, on this Application and, if technically and legally feasible, by sending a notification to users via one of the ends contact of which is in possession the Holder. Please therefore check this page regularly, referring to the last modified date shown at the bottom.

This privacy policy was made available March 1, 2019