

PRIVACY POLICY

INFORMATION ON THE PROCESSING OF PERSONAL DATA of users who consult the Data Controller's websites in accordance with Article 13 of Regulation (EU) 2016/679

Pursuant to EU Regulation No. 679/216 (the General Data Protection Regulation, "GDPR"), this page describes the methods of processing the personal data of users who consult the websites of Villa Roma Imperiale Srl (hereinafter "Villa Roma Imperiale Sites" or simply "Sites") that can be accessed electronically at the following addresses:

<http://www.villaromaimperiale.com>

<https://www.villaromaimperiale.it>

<https://www.villaromaimperiale.eu>.

When you make a booking by selecting arrival and departure dates from the relevant booking forms on the aforementioned websites, a connection is made to a booking engine (<https://www.blastnessbooking.com>). This booking engine is provided by our Partner Blastess, appointed as Data Processor, as noted in this privacy policy.

This information does not apply to other sites, pages or online services accessible via hypertext links that may be published on the sites but refer to resources outside the domain villaromaimperiale.

THE DATA CONTROLLER

The data controller for personal data is Villa Roma Imperiale Srl, with registered office at Via Salvador Allende 19/G1 - 50127 Florence, Tax Code, VAT No. and Companies Register No. 01889150973, direzione@villaromaimperiale.com. The operational headquarters are located in Forte dei Marmi (LU) VIA CORSICA, 9 55042 F. DEI MARMI (LU) - ITALY - TEL. +39 0584 78830 - FAX +39 0584 80841.

TYPE OF DATA PROCESSED

Browsing data. During their normal operation, the computer systems and software procedures used to operate this website acquire some personal data, the transmission of which is implicit in the use of internet communication protocols. This information is not collected with the intent of associating it with identified users but may, by its nature, lead to the identification of users through processing and association with data held by third parties. This category of data includes the IP addresses or domain names of computers used by users connecting to the website, the URI (Uniform Resource Identifier) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, failed, etc.) and other parameters associated with the operating system and the computer environment. Such data is only used to obtain anonymous statistics related to the use of the Site and to check that it is functioning correctly; it is deleted immediately after processing. The data may be used to ascertain responsibility in the event of hypothetical computer attacks against the site: currently, with the exception of this eventuality, data about web contacts is not retained for more than seven days.

Data communicated by the user The optional, explicit and voluntary sending of messages to the addresses indicated on the Villa Roma Imperiale Sites, as well as the completion and submission of the forms on Villa Roma Imperiale Sites or on the booking engine managed by BLASTNESS Srl, entail acquiring the sender's contact details, necessary to respond, as well as all the personal data included in the communications (including that entered in the completed forms and forwarded through the Villa Roma Imperiale Sites). Specific summary information will be progressively reported or displayed on the pages of the Villa Roma Imperiale Sites, which may be set up for the provision of certain services.

For all information relating to **cookies** on this site, please refer to our Cookie Policy at the following link:

https://www.villaromaimperiale.com/pdf/Cookie_Villa_Roma_Imperiale_en.pdf.

PURPOSE AND LEGAL BASIS OF THE PROCESSING

The personal data provided in the manner described in this statement will be processed for the following purposes and on the following legal bases:

- a) To provide information to the website user about the services provided by the data controller, to receive a request for a quote or information from the website user. *The legal basis for this processing is the need to implement pre-contractual measures at the request of the data subject.*
- b) To acquire and confirm bookings of accommodation services and any additional services requested by the website user. *The legal basis for this processing is the need to execute a contract to which the data subject is a party.*
- c) For administrative purposes and to fulfil legal obligations such as those relating to accounting or tax, or to comply with requests from the judicial authority. *Legal basis for the processing: compliance with legal obligations.*

DATA PROVISION

Apart from that specified for browsing data, whose provision is necessary to navigate the website, the user is free to provide personal data contained in the request forms or indicated in contacts to request the sending of informational material or other communications. Failure to provide such data may make it impossible to obtain what is requested.

The data controller may refuse to authorise the use of cookies and deactivate them at any time, in the manner detailed in the cookie policy.

It should be noted, however, that in this case, the Site or some of its features may not function properly:

https://www.villaromaimperiale.com/pdf/Cookie_Villa_Roma_Imperiale_en.pdf.

DATA RETENTION PERIOD

The data provided will be processed for the time strictly necessary to respond to requests and communications voluntarily sent by the customer. Web browsing data is kept for no more than seven days. Cookies are stored for the period indicated in the cookie policy accessible at the following link

https://www.villaromaimperiale.com/pdf/Cookie_Villa_Roma_Imperiale_en.pdf.

INFORMATION SECURITY

Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorised access, in compliance with the provisions of Articles 24 and 25, GDPR.

In any case, Villa Roma Imperiale Srl cannot be held liable for unauthorised access or loss of personal information attributable to the data subject or in any case beyond its control.

No data acquired via the web will be communicated to third parties except as otherwise indicated in the Cookie Policy accessible at the following link

https://www.villaromaimperiale.com/pdf/Cookie_Villa_Roma_Imperiale_en.pdf.

LOCATION OF DATA PROCESSING AND TRANSFER

The processing of personal data connected to the web services of this site is not subject to transfers to third countries, unless otherwise indicated in the Cookie Policy.

The Data Controller hereby ensures that where it uses external data processing managers (Article 28 GDPR) with servers located in third countries, the assignment will be in compliance with the applicable legal provisions, with a guarantee of an appropriate level of protection and/or subject to appropriate guarantees (for example on the basis of a decision by the European Commission on the suitability of the third country, or through the stipulation of standard contractual clauses envisaged by the European Commission).

DATA ACCESS RECIPIENTS OF PROCESSED DATA

Access to Personal Data collected as a result of browsing the website and making requests and/or bookings through the website is only permitted to those in charge of processing, expressly authorised by the Data Controller, and to the designated data processors with an assignment having the characteristics referred to in Article 28 GDPR.

The Data Controller is aware of the importance of data security for customers and has selected the data processors very carefully.

The Data Controller has appointed as Data Processor, pursuant to Article 28 GDPR, BLASTNESS SRL - VAT No./Tax Code: 01195440118 – MILAN REA (ECONOMIC ADMINISTRATIVE INDEX) REGISTRATION NO. 2107189 Registered Office: Galleria del Corso, 2 – 20122 Milan, Italy, with reference to the processing of personal data provided by customers booking a stay through the data controller's website. More precisely, it should be noted that if the user intends to make a booking on the Villa Imperiale Sites, the user will be connected to the search engine managed by

BLASTNESS SRL, <https://www.blastnessbooking.com/>, which ensures an encrypted and protected access session.

The complete, updated list of data processors (pursuant to Article 28 GDPR) appointed is available at the data controller's registered office. You can request a copy of the updated list at any time by contacting the data controller at the addresses and contact details indicated in this document.

No data deriving from the web service is disclosed. The data cannot be communicated to third parties except to external parties who work with the Data Controller (professionals/companies that provide legal advice, assistance, tax, accounting, competent authorities for the fulfilment of legal obligations, parties that provide services for managing IT systems and assistance to the website) to fulfil the contract and limited to the aforementioned purposes, all of which shall be bound by the obligation of confidentiality. In any case, in compliance with the principles of data processing set out by the GDPR, only the data necessary to perform the activities entrusted to them will be transmitted to external parties.

Personal data provided by users who request informational material to be sent is used only to provide the service requested and communicated to third parties only where this is necessary for said purpose (e.g. shippers or carriers).

DATA SUBJECTS' RIGHTS

Data subjects have the right to obtain from the Data Controller, in the cases provided, access to personal data, rectification or erasure of data or limitation of the processing that concerns them, or to oppose the processing, and to lodge a complaint with the Data Protection Authority (Article 7 and Articles 15 et seq., GDPR)

Requests addressed to the Data Controller may be sent to the Data Controller at the following address: Villa Roma Imperiale SRL, Via Salvador Allende 19/G1 - 50127 Florence.

Complaints to the supervisory authority may be addressed to the Data Protection Authority in the manner indicated on its website, which can be accessed at: www.garanteprivacy.it.

CHANGES

The Data Controller reserves the right to modify or amend this privacy policy, wherever posted on the site, at any time, especially as a result of new sector regulations entering into force. At any time, by connecting to the site, users may check the latest version of the privacy policy, as updated from time by time by the Data Controller.

Last updated September 2019