

## **Information pursuant to GDPR 679/2016 on the processing of personal data**

The processing of personal data means any operation or set of operations, performed with or without the aid of automated processes and applied to personal data or sets of personal data, even if not recorded in a database, such as collection, registration, organization, structuring, storage, processing, selection, blocking, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction.

The personal data provided directly by the user to Villaggio Tecciù di Cuppi di Eliana Becchio also through the pages of the website accessible at the address (URL) [www.tecciudicuppi.it](http://www.tecciudicuppi.it) ("Site") at the time of registration and subsequently for the use of the services provided from time to time by the company, will be processed in compliance with the provisions of Legislative Decree 196/2003 on the protection of personal data ("Privacy Code") and following the entry into force of EU Regulation 679/2016 ("GDPR") in accordance with the provisions of art. 13 of the aforementioned European Regulation.

Eliana Becchio informs the user of the following.

According to the legislation indicated, this processing will be based on the principles of correctness, lawfulness and transparency and protection of your privacy and your rights and in compliance with the principle of minimization and limitation, i.e. used only to the extent necessary with respect to the purposes for which they are processed; for the above:

- all reasonable measures must be taken to promptly erase or rectify inaccurate data with respect to the purposes for which they are processed;
- integrity and confidentiality must be guaranteed, i.e. the data will be processed in a manner that guarantees adequate security of the personal data, including protection, through appropriate technical and organizational measures, from unauthorized or unlawful processing and from accidental loss, destruction or damage;
- the provisions regarding the accountability of the data controller must be complied with.

For the above, we therefore provide you with the following information.

### 1. Purpose

The user's personal data, freely communicated and acquired by virtue of the activity carried out by the data controller, will be processed lawfully and correctly for the following purposes:

A. Without the express consent of the user (art. 24 letter a, b, c Privacy Code and art. 6 letter b, c, f of the GDPR): - the data will be collected and used exclusively for purposes directly connected and instrumental to the activation and operation of the services provided by the data controller, to comply with all legal obligations, including accounting and tax, to comply with the obligation set out in article 109 of the Royal Decree of 18.6.1931 n. 773, which requires us to register and communicate to the Police Headquarters the personal details of the guests staying there and for the legitimate interest of the company.

B. Only with specific and separate consent and until revoked (articles 23 and 130 of the Privacy Code and art. 7 of the GDPR) use of photos taken by the data controller inside the facility for publication on the Facebook page of Tecciù di Cuppi.

C. Only with specific and separate consent of the user and until revoked (articles 23 and 130 of the Privacy Code and art. 7 of the GDPR) use of your personal data for communication to third parties in the event of receiving messages and phone calls during your stay.

D. Only with specific and separate consent of the user and until revoked (articles 23 and 130 of the Privacy Code and art. 7 of the GDPR) use of your personal data, in particular the email address and postal mail, by the data controller, for sending proposals and for sending advertising material relating to commercial communication, including the newsletter relating to offers on the Site (so-called "marketing" purposes).

The user may object to the processing referred to in art. B, art. C and art. D at any time after having given his/her consent by sending an email to [info@tecciudicuppi.it](mailto:info@tecciudicuppi.it)

Failure to consent to the purpose referred to in this point will not in any way affect the user's ability to use the data controller's services.

## 2. Methods

The processing will be carried out with the following methods: the Data Controller processes the Personal Data of Users by adopting appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data. The processing is carried out using manual, computerized and/or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, categories of persons involved in the business organization of the owner (administrative, commercial, marketing, legal, system administrators) or external parties (such as third-party technical service providers, postal couriers, hosting providers, IT companies, communications agencies) may have access to the data, also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Data Processors may always be requested from the Data Controller.

In particular, the user's personal data may be communicated to specific subjects, appointed by the Data Controller to provide services that are instrumental or necessary for the performance of obligations related to the company's activity.

## 3. Legal basis of the processing

The legal basis of the processing is constituted by the user's consent, the fulfillment of a contractual obligation and the provisions of legal obligations (art. 6 c.1 lett. a, b, c).

## 4. Place

The Data are processed at the Data Controller's headquarters, located in Via Inavecchia 6 R Magliolo and at the headquarters of the external managers appointed pursuant to art. 28 GDPR, carefully selected for reliability and competence.

5. Times The Data are processed and stored for the period necessary to pursue the purposes relating to the service and specifically to the purposes described above (five years) without prejudice to the retention period imposed by law. The data will be stored for a further period relating to the purposes of disputes and any litigation. The User can always ask for the interruption of the Processing or the deletion of the Data.

## 6. Identity and contact details of the owner

The data controller is: Eliana Becchio located in Via Inavecchia 6 Magliolo. E-mail: [info@tecciudicuppi.it](mailto:info@tecciudicuppi.it)

## 7. Rights of the interested party

You can exercise your rights towards the data controller at any time. The user (hereinafter also "interested party"), pursuant to the provisions of art. 7 of the Privacy Code and art. 15 and following of the GDPR, has the right to:

- obtain confirmation of the existence or otherwise of personal data concerning him or her, even if not yet registered, and their communication in an intelligible form;
- obtain the indication of: a) the origin of the personal data; b) the purposes and methods of the processing; c) the logic applied in the event of processing carried out with the aid of electronic instruments; d) the identification details of the owner, the managers and the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of them in their capacity as designated representative in the territory of the State, managers or agents;
- obtain: a) the updating, rectification or, when there is interest, the integration of the data; b) the cancellation, transformation into anonymous form or blocking of data processed in violation of the law, including data whose retention is not necessary in relation to the purposes for which the data were collected or subsequently processed; c) certification that the operations referred to in letters a) and b) have been brought to the attention, also with regard to their content, of those to whom the data were communicated or disseminated, except in the case in which such fulfillment proves impossible or involves the use of means manifestly disproportionate to the right protected;
- object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning him/her, even if pertinent to the purpose of the collection; b) to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated calling systems without the intervention of an operator by email and/or through traditional marketing methods by telephone and/or paper mail. Please note that the interested party's right to object for direct marketing purposes by automated methods extends to traditional methods and that in any case the possibility for the interested party to exercise the right to object even only in part remains intact. Therefore, the interested party can decide to receive only communications through traditional methods or only automated communications or neither of the two types of communication;
- ask the owner for access to personal data (art. 15 GDPR), rectification (art. 16 GDPR) or erasure (art. 17 GDPR) of the same, limitation of processing or to object to their processing (art. 18 GDPR);
- to the external portability of data processed in automated form where applicable;
- to withdraw consent at any time without prejudice to the lawfulness of processing based on consent given before withdrawal;
- lodge a complaint with the Authority for the protection of personal data. To exercise the rights indicated above, as well as to receive information relating to the subjects with whom the data are archived or to whom the data are communicated or to the subjects who, as managers or agents, may become aware of your data, you can contact the owner by sending a request to the following email address: [info@tecciudicuppi.it](mailto:info@tecciudicuppi.it)