### European law GDPR 2016/679

Privacy

### **General Information**

Barcavelando srl (hereinafter also the company) has drawn up the present data protection statement in order to inform visitors to the <a href="www.villastella.it">www.villastella.it</a> website about the terms and purposes of data processing. In particular, visitors and any person who makes use of the services offered on the websites, are informed, in accordance with Article 13 Italian Legislative Decree of 30th June 2003 No. 196 (Data Protection Code) about the processing of data. The present data protection statement relates exclusively to the aforesaid website and does not apply to linked sites, which may be visited by the users of our website.

The present privacy policy is an integral component of our website and of the services offered by us. To access the website and use the same, as well as to purchase the products offered on the website you are required to read and understand the present privacy policy. Should you not be in agreement with the present privacy policy, we would ask you not to use our website.

The company may amend or update the present privacy policy in whole or in part. Amendments and additions to the privacy policy may be viewed by all users in the privacy column of the website and are binding with effect from publication on the website. Should the user not be in agreement with the amendments, he may cease using our website. The continued use of our website and our products and services subsequent to publication of the aforementioned amendments and/or modifications shall be deemed acceptance of the amendments and acknowledgement of the binding nature of the new conditions. The website, www.villastella.it, is the property of the company and is administered by the said company.

Types of data collection and processing purpose:

### Navigation data

In normal use, the systems and software processes required for correct performance of the website collect some personal data, the transmission of which is part of the normal use of Internet communication protocols. These data concern information, which is not collected in order to identify the subject, but which by virtue of their properties allow users to be identified through the processing and compilation of data transmitted by a third party.

This category of data includes the IP addresses or the names of domains, the computer used by the users of the website, the URI (uniform resource identifier) of the resources requested, the time the enquiry was made, the method used to make the enquiry with the server, the size of the file received as response, the status data of the response given by the server (successful, error, etc.) as a numerical code and other parameters with respect to the operating system and the user's computer environment.

These data serve exclusively for statistical purposes and are administered solely in anonymous form, in order to ensure their correct function. The data may be also used to establish responsibility in the event of

hypothetical breaches of IT law resulting in damage to the website. With the exception of this case, the aforementioned data shall not be stored for more than 24 months.

Data supplied voluntarily by the users/visitors

Data, which are transmitted by the visitor to the website, voluntarily and expressly for the purpose of using specific services (e.g. the newsletter, , etc.) and to the Barcavelando srl by means of e-mail enquiries, may be automatically registered, in which case the information is used exclusively for the services specified in the communication of the information.

Your data are used for the purpose of responding to your specific queries, fulfilling contractual duties, tax or accounting duties, billing, debt collection and for compliance with the duties prescribed by the statutes in force.

### Cookies

This website also collects personal data by means of the use of cookies. Further information on the Barcavelando srl Cookie Policy can be found on the following link: http://www.tecnoprogress.net/privacy.aspx?domain=villastella.it&lang=it

With the exception of navigation data the Barcavelando srl solely processes data, which has been submitted voluntarily and expressly by the user. If you refuse to transfer certain information, you may however find that you are restricted in the services offered.

Once the registration is made, the personal data are processed solely for the services specified in the communication of the information.

The visitor to the website may register for one or more of the following services:

Newsletter

Information on services or products, offers, enquiries etc.

Participation in various initiatives

Purchases or reservations of the products offered on the website

Announcing the visitor's interest in working with the company and/or responding to a job vacancy advertisement

Contacting the company using the form provided for this purpose

Enquiring about the availability of rooms for a specified period and a specific number of persons

Book directly on the website

There follows a short list concerning the specific use of personal data on the website. In order to use the services the user may be required to supply some or all of the following data: forename, surname, age, street, post code,e-mail address, city, country, date of birth, telephone number, mobile number, fax, payment method, period of stay, number of guests (adults and children), forename and surname of additional guests. Please, note that other information may also be requested. Newsletter

### **Newsletter section:**

Visitors have the opportunity to subscribe to our newsletter. If you register, all personal data pursuant to the information letter or for the purpose of data processing in accordance with the internal process for administering contacts are processed. The enquiry is subject to the user's express agreement, entered by clicking on the appropriate box, of the company's privacy policy.

# **Booking on-line and check availability section:**

In this section, the user may check room availability directly on the website by entering his search criteria. For this purpose the user must enter the following personal data:

The enquiry is subject to the user's express agreement, entered by clicking on the appropriate box, of the company's privacy policy.

# **Contact section:**

Visitors have the opportunity to contact the company using the form provided for the purpose. If you make an enquiry, all your personal data pursuant to the information letter and for the purpose of data processing in accordance with the internal process for contact are processed. This service is subject to the user's express agreement, entered by clicking on the appropriate box, of the company's privacy policy.

# **Processing of personal data**

Within the meaning of Article 28 of the Italian Legislative Decree of 30th June 2003 No. 196 (Data Protection Code) the Barcavelando srl, a company under Italian law is the rights holder of the administration and processing of all personal data, which may be collected via the aforesaid home page.

Personal data are processed solely within the meaning of the present data protection statement, by officers and employees of Barcavelando srl who are expressly appointed as authorised agents for the purposes of date protection processing. The employees have been appropriately trained in this respect and work under the direct supervision and responsibility of the proprietor of the data protection processing.

The responsible officer for data processing is the current manager of IT security for the Barcavelando srl . A current list of all data protection authorised agents may be requested by e-mail from the proprietor itself or from the data processing officer at info@villastella.it

## **Disclosure to third parties**

In no circumstances are your personal data disclosed unless statutory provisions require that they be submitted to a judicial authority or other corporate bodies and institutes.

In addition, the company uses the services of other companies and/or persons to perform specific services, such as sending e-mails, delivery of packages, the processing of payments. The aforementioned third parties have access only to those personal data, which are absolutely necessary for them to carry out their responsibilities. The company stresses that these third parties are forbidden from using the personal data for other purpose and are under a duty to use these data in conformity with the privacy policy and the statutory provisions currently in force.

### **Retention of the data**

Information and personal data, which is collected on this website, including that which the visitor voluntarily submits, in order to receive informational material or other messages, by writing to the addresses given in the Contact section, are retained only for the period absolutely necessary to perform the required service. Once the service has been performed, all personal data are deleted on the basis of the data protection guidelines of the Barcavelando srl , subject to conflicting governmental requirements or retention required by statute.

### **Exercise of existing rights**

The person concerned has at any time the right in accordance with Article 7 Data Protection Code to receive confirmation regarding the existence or non-existence of personal data and to discover the content and origin of these data, to check their accuracy and completeness and to request that they be updated or corrected. Furthermore he is entitled to require that data, which have been used illegally, are deleted, anonymised or blocked and to oppose the use of the said data at any time for good cause. For these purposes the person concerned must contact the owner of the data processing system or the data security officer via the e-mail address info@villastella.it.

### **Data security**

Barcavelando srl protects personal data by means of internationally recognised security standards and by means of processes, which make

unauthorised access

unauthorised use and dissemination

unauthorised modification

loss and inadvertent or unlawful destruction impossible.

### Other personal data collection channels of the Barcavelando srl Company

Verticalbooking: hotel reservation software

OLTA (Booking.com, HRS, Expedia, Trivago, Trentino Holiday, Feratel)

Solocloud manager: access management system to the wifi network

Website www.villastella.it

Check in

# Storage of personal data

GP Data Scrigno: management in hosting for hotel reservations and mailing

Mmail: mailing

Mail chimp: management and sending e-mails and newsletters