

## **Privacy 196/2003**

As per Law Decree No. 196/2003 (the 'Personal Data Privacy Law'), our company, intends to process the personal data that you have provided exclusively for the fulfilment of the obligations prescribed by contract or law that govern the business relationship between us. For this reason, we will not process confidential data or data of judicial pertinence. As per Art. 13 of the above-mentioned law, we are obliged to inform you of the following:

### **Purpose of data processing:**

The data that you place at our disposal will be processed in the context of our company's daily operations and in particular for the fulfilment of the obligations imposed by contract or law (e.g. compliance with administrative, fiscal and accounting, etc. requirements) and for market research and direct marketing.

### **Method of treatment:**

As regards the method of treatment given, we inform you that your data will be entered in special identification archives in both paper and computerised form with adequate security measures taken for the protection of the privacy in accordance with the regulations in force. Your personal data will be processed by the appropriate data processing and filing software.

### **Obligatory or optional data entry:**

We inform you that your consent is not required (as per Art. 23 and respective amendments of the above-mentioned law) whenever our company requires the data in question for the fulfilment of obligations prescribed by contract or law, whenever such data can be taken from public registers, lists, deeds or documents that are part of public domain and can be freely accessed by anyone and whenever such data is processed for the defence of rights in Court of Law. In any case however, all such data can be processed but not disclosed.

### **Consequences of refusal to grant consent:**

Your refusal to consent to our processing of data we consider fundamental as per Point a) above (such as names, registered office, headquarters, branch offices, capital stock, telephone numbers, fax numbers, name of legal representative, V.A.T. and income tax registration numbers, corporate purpose and banking co-ordinates, etc.) may prevent us from establishing or continuing a contractually-regulated business relationship with you.

### **Parties to whom your data may be communicated:**

Your personal data may be communicated to the parties in the following categories:

- Parties granted rights to data access by law;
- payment and payment collection management credit institutes, insurance companies, and auditors;
- credit recovery companies;
- data processing and information technology companies;
- correspondence service companies;
- consociate, subsidiary or parent companies.

### **Parties that may gain awareness of your data in the execution of their duties**

Your personal data will be processed by parties in the following categories:

- company management, in their role as the parties in charge of such processing;
  - headquarter operatives, in their role as the parties in charge of such processing;
  - hotel management operatives, in their role as the parties in charge of such processing;
  - front office, reservations, administration, sales & marketing and accounting operatives of the property managed by Castel Porrone S.r.l., in their role as the parties in charge of such processing.
- Such data will never be distributed without your previous written consent.

Rights as per Art. 7 of Law Decree 196/2003

Lastly, in regard to the above, we inform you of your rights as per Art. 7 of the above-mentioned law and precisely what you may be entitled to receive at our expense:

- a) the indication of the origin of the data, the purposes and methods of processing, the identification of the owner of the processing and the managers in charge of processing, and the categories of party to whom such data can be communicated or those who may come to the awareness of such data in the performance of their duties as parties assigned to data processing;
- b) the confirmation of the existence of the personal data that regards you and the logic applied to any computerised processing performed;
- c) the cancellation and transformation in anonymous form of any data processed in violation of the above-mentioned law;
- d) the updating, correction and completion - if you desire - of such personal data;
- e) the certification that the operations mentioned in Points c) and d) were brought to the attention of those to whom such data has been communicated or distributed with the exception of the cases prescribed by law;
- f) the right to oppose on legitimate grounds the processing of your personal data, even when such processing is performed for appropriate purposes;
- g) the right to oppose, in any case, the processing of your personal data for the purpose of transmission of direct sales or advertising material or commercial communication or market research.

Parties assigned to processing:

The owner of the processing performed is Dott. Mariano Giovane, with registered office in Via Crescenzo, 9 - Roma.

Cookies

What is a cookie?

A cookie is a small amount of data that is placed in the browser of your computer or on your mobile device.

Why are cookies used?

Web pages have no memory. If you are surfing from page to page within a website, you will not be recognized as the same user across pages. Cookies enable your browser to be recognized by the website. So cookies are mainly used to remember the choices you have made – choices such as the language you prefer and the currency you use. They will also make sure you are recognized when you return to a website.

Do all cookies do the same thing?

No, there are different types of cookies and different ways of using them. Cookies can be categorized according to their function, their lifespan and according to who places them on a website.

How are cookies used?

Our website uses the following types of cookies:

- Technical cookies: We try to provide our visitors with an advanced and user-friendly website that adapts automatically to their needs and wishes. To achieve this, we use technical cookies to show you our website and to make it function correctly. These technical cookies are absolutely necessary for our website to function properly.
- Functional cookies: We also use functional cookies to remember your preferences and to help you use our website efficiently and effectively. These functional cookies are not strictly necessary for the functioning of our website, but they add functionality for you and enhance your experience.
- Analytics cookies: We use these cookies to gain insight on how our visitors use the website, to find out what works and what doesn't, to optimize and improve our website and to

ensure we continue to be interesting and relevant. The data we gather includes which web pages you viewed, which referring/exit pages you entered and left from, which platform type you used, date and time stamp information and details such as the number of clicks you make on a given page, the search words you use and the text you type while using our website.

How long do our cookies stay active?

The cookies we use have varying lifespans. You can erase all cookies from your browser any time you want. To remove cookies from your browser, please follow instructions at <https://support.google.com/accounts/answer/32050?hl=en>

How can you recognize our cookies?

You can find our cookies in your browser settings.

Does our website use third-party marketing and analytics cookies?

Yes, we may use third-party providers for analytical purposes. To enable their services, these companies need to place cookies.

In order to control the collection of data for analytical purposes by Google Analytics, you may want to visit the following link: [Google Analytics Opt-out Browser Add-on](#).

How can you manage your cookie preferences?

Using your browser settings in, for example, Internet Explorer, Safari, Firefox or Chrome, you can set which cookies to accept and which to reject. Where you find these settings depends on which browser you use. Use the 'Help' function in your browser to locate the settings you need.

If you choose not to accept certain cookies, you may not be able to use some functions on our website.