

## Cookie Policy

Cookies are made up of portions of code installed inside the browser that assist the Controller in providing the Service according to the purposes described. Some of the purposes for which Cookies are installed may also require the User's consent, which may be freely revoked at any time by following the instructions contained in this document.

### TECHNICAL AND AGGREGATE STATISTICS COOKIES

#### Activities strictly necessary for operation

This Website uses Cookies to save the User's session and to perform other activities strictly necessary for the operation of this Website, for example in relation to traffic distribution.

#### Saving preferences, optimisation and statistical activities

This Website uses Cookies to save your browsing preferences and optimise your browsing experience. These Cookies include, for example, those for setting the language and currency or for statistics management by the Website Owner.

### OTHER TYPES OF COOKIES OR THIRD PARTY TOOLS THAT MAY INSTALL THEM

Some of the services listed below collect statistics in aggregate and anonymous form and may not require the User's consent or may be managed directly by the Owner - as described - without the help of third parties.

If among the tools indicated below there are services managed by third parties, these may - in addition to what is specified and also without the knowledge of the Owner - carry out tracking activities on the User. For detailed information on the subject, we recommend that you consult the privacy policies of the services listed

### CONTACTING THE USER

#### Mailing list or newsletter (this Website)

By registering to the mailing list or newsletter, the User's e-mail address is automatically added to a list of contacts to whom e-mail messages may be sent containing information, including information of a commercial and promotional nature, relating to this Website. The User's e-mail address may also be added to this list as a result of registering on this Web Site or after making a purchase.

Personal Data collected: Postcode, city, last name, Cookie, date of birth, Usage Data, e-mail, address, country, first name, telephone number, province, company name, gender, website and state

### MANAGING CONTACTS AND SENDING MESSAGES

This type of service enables the management of a database of e-mail contacts, telephone contacts or contacts of any other type used to communicate with the User. These services may also allow us to collect data relating to the date and time the User views the messages, as well as the User's interaction with them, such as information on clicks on links inserted in the messages

#### SendinBlue E-mail (SendinBlue SAS)

SendinBlue is an address management and email messaging service provided by SendinBlue SAS.

Personal data collected: Cookie, Usage data and email.

Place of processing: France - [Privacy Policy](#).

### USER DATABASE MANAGEMENT

These types of services allow the Controller to build user profiles from an email address, name or any other information that the User provides to this Website, as well as to track the User's activities through statistical features. This Personal Data may also be cross-referenced with publicly available information about the User (such as social network profiles) and used to build private profiles that the Data Controller may view and use to improve this Website. Some of these services may also allow the scheduled sending of messages to the User, such as emails based on specific actions taken on this Website

#### SendinBlue Marketing Automation (SendinBlue SAS)

SendinBlue is a User database management service provided by SendinBlue SAS.

Personal Data collected: Cookie, Usage Data and email.

Place of processing: France - [Privacy Policy](#).

## **TAG MANAGEMENT**

This type of service is functional for the centralised management of tags or scripts used on this Website. The use of these services entails the flow of the User's Data through them and, where appropriate, their retention.

### **Google Tag Manager (Google LLC)**

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

## **HEAT MAPPING AND SESSION RECORDING**

Heat mapping services are used to identify which areas of a page are subject to cursor or mouse clicks in order to detect which of them attract the most interest. These services make it possible to monitor and analyse traffic data and are used to keep track of User behaviour. Some of these services may record sessions and make them available for later viewing.

### **Smartlook (Smartsupp.com, s.r.o.)**

Smartlook is a heat mapping and session recording service provided by Smartsupp.com, s.r.o.

Personal Data collected: Cookies, Usage Data and various types of Data as specified by the privacy policy of the service.

Place of processing: Czech Republic - [Privacy Policy](#).

## **INTERACTION WITH LIVE CHAT PLATFORMS**

This type of service allows the User to interact with live chat platforms, operated by third parties, directly from the pages of this Website. This allows the User to contact the support service of this Website or this Website to contact the User while he/she is browsing its pages. If a service for interacting with live chat platforms is installed, it is possible that, even if Users do not use the service, it will collect Usage Data relating to the pages where it is installed. In addition, live chat conversations may be recorded

### **Facebook Messenger Customer Chat (Facebook, Inc.)**

Facebook Messenger Customer Chat is an interaction service with the Facebook Messenger live chat platform, provided by Facebook, Inc.

Personal Data collected: Cookies, Usage Data and About Me.

Place of processing: United States - [Privacy Policy](#).

### **Tawk.to Widget (tawk.to ltd.)**

The Tawk.to Widget is a service for interacting with the Tawk.to live chat platform, provided by tawk.to ltd.

Personal Data collected: Cookies and Usage Data.

Place of processing: United Kingdom - [Privacy Policy](#).

## **INTERACTION WITH SOCIAL NETWORKS AND EXTERNAL PLATFORMS**

This type of service allows you to interact with social networks, or other external platforms, directly from the pages of this Website. The interactions and information acquired by this Website are in each case subject to the User's privacy settings relating to each social network. If a social network interaction service is installed, it is possible that, even if Users do not use the service, it collects traffic data relating to the pages where it is installed

### **AddThis (Addthis Inc.)**

AddThis is a service provided by Clearspring Technologies Inc. that displays a widget that allows interaction with social networks and external platforms and the sharing of content on this Website. Depending on how it is configured, this service may display widgets belonging to third parties, e.g. the operators of the social networks on which interactions are shared. In this case, the third parties providing the widget will also learn about the interaction made and the Usage Data relating to the pages where this service is installed.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **Facebook Like Button and Social Widgets (Facebook, Inc.)**

The Facebook "Like" button and social widgets are services for interaction with the social network Facebook, provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **ShareThis (Sharethis Inc.)**

ShareThis is a service provided by ShareThis Inc that displays a widget that enables interaction with social networks and external platforms and the sharing of content on this Website. Depending on how it is configured, this service may display widgets belonging to third parties, e.g. the operators of the social networks on which interactions are shared. In this case, the third parties providing the widget will also learn about the interaction made and the Usage Data relating to the pages where this service is installed.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **SPAM PROTECTION**

This type of service analyses traffic on this Website, potentially containing Users' Personal Data, in order to filter it from traffic, messages and content recognised as SPAM

#### **Google reCAPTCHA (Google Inc.)**

Google reCAPTCHA is a SPAM protection service provided by Google Inc. Use of reCAPTCHA is subject to Google's [privacy policy](#) and [terms of use](#).

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **REMARKETING AND BEHAVIORAL TARGETING**

This type of service allows this Website and its partners to communicate, optimise and serve advertisements based on the User's past use of this Website. This activity is carried out through the tracking of Usage Data and the use of Cookies, information that is transferred to the partners to which the remarketing and behavioral targeting activity is linked. In addition to the opt-out possibilities offered by the services below, the User may opt out of receiving cookies related to a third-party service by visiting the [Network Advertising Initiative opt-out page](#)

#### **AdWords Remarketing (Google Inc.)**

AdWords Remarketing is a remarketing and behavioral targeting service provided by Google Inc. that links the activity of this Website with the Adwords advertising network and the Doubleclick cookie.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **Facebook Remarketing (Facebook, Inc.)**

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that links the activity of this Website with the Facebook advertising network.

Personal Data collected: Cookies and Usage Data.

Place of Processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **Remarketing with Google Analytics for display advertising (Google Inc.)**

Google Analytics for display advertising is a remarketing and behavioral targeting service provided by Google Inc. that links the tracking activity performed by Google Analytics and its Cookies with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

Place of Processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **Facebook Custom Audience (Facebook, Inc.)**

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Facebook, Inc. that links the activity of this Website with the Facebook advertising network.

Personal data collected: Cookies and email.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **STATISTICS**

The services contained in this section allow the Data Controller to monitor and analyse traffic data and serve to track User behaviour

#### **Display Advertisers extension for Google Analytics (Google Inc.)**

Google Analytics on this Website may use Google's interest-based advertising, third-party audience data and information from the DoubleClick cookie to extend statistics with demographic data, interests and data on interactions with advertisements.

Personal Data Collected: Cookies and Usage Data.

Place of Processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **User ID extension for Google Analytics (Google Inc.)**

Google Analytics on this Website uses a function called User ID. This allows for more accurate tracking of Users by assigning each User a unique ID for various sessions and devices, but in a way that does not allow Google to personally identify an individual or permanently identify a specific device. The User ID extension also allows the connection of Data from Google Analytics with other User Data collected by this Website. The Opt Out link provided below allows you to disable tracking for the device you are using, but does not exclude further tracking activities carried out by the Data Controller. To deactivate these as well, please contact the owner via the contact email address.

Personal Data Collected: Cookies.

Place of processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **Google Analytics (Google Inc.)**

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google uses the Personal Data collected in order to track and examine the use of this Website, compile reports and share them with other services developed by Google. Google may use the Personal Data to contextualise and personalise ads on its advertising network.

Personal Data collected: Cookies and Usage Data.

Place of Processing: United States - [Privacy Policy](#) - [Opt Out](#).

#### **Facebook Ads Conversion Tracking (Facebook, Inc.)**

Facebook Ads conversion tracking is a statistics service provided by Facebook, Inc. that links data from the Facebook ad network with actions taken within this website.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **Conversion tracking by Google AdWords (Google Inc.)**

Google AdWords conversion tracking is a statistics service provided by Google Inc. that links data from the Google AdWords ad network with the actions performed within this Website.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **Wordpress Stat (Automattic Inc.)**

Wordpress Stats is a statistics service provided by Automattic Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **DISPLAY OF CONTENT FROM EXTERNAL PLATFORMS**

This type of service makes it possible to display content hosted on external platforms directly from the pages of this Website and to interact with them. If a service of this type is installed, it is possible that, even if Users do not use the service, it may collect traffic data relating to the pages where it is installed

#### **Google Maps widget (Google Inc.)**

Google Maps is a map display service operated by Google Inc. that allows this Website to integrate such content into its pages.

Personal data collected: Cookies and Usage Data.

Place of processing: United States - [Privacy Policy](#).

#### **HOW CAN I CONSENT TO THE INSTALLATION OF COOKIES?**

In addition to what is set out in this document, you can manage your cookie preferences directly within your browser and prevent - for example - third parties from installing cookies. You can also use your browser preferences to delete

cookies that you have installed in the past, including any cookies in which you have saved your consent to the installation of cookies by this website. The User can find information on how to manage Cookies with some of the most popular browsers at the following addresses for example: [Google Chrome](#), [Mozilla Firefox](#), [Apple Safari](#) and [Microsoft Internet Explorer](#).

With regard to Cookies installed by third parties, the User may also manage its settings and revoke consent by visiting the relevant opt-out link (if available), using the tools described in the third party's privacy policy or by contacting the third party directly.

Notwithstanding the foregoing, you may take advantage of information provided by [EDAA \(EU\)](#), [Network Advertising Initiative \(US\)](#) and [Digital Advertising Alliance \(US\)](#), [DAAC \(Canada\)](#), [DDAI \(Japan\)](#) or other similar services. With these services it is possible to manage the tracking preferences of most advertising tools. The Owner therefore advises Users to use these resources in addition to the information provided herein.

## **IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER**

The Data Controller is Fin Coretur s.r.l. with registered office in Via Piersanti Mattarella 20 - 90141 Palermo and local unit c/o Hotel Conte di Cabrera in Contrada Maganuco - 97015 Modica (RG). For the purposes of exercising your rights as a data subject listed below, the Data Controller may be contacted at the pec address [fincoretursrl@pec.it](mailto:fincoretursrl@pec.it) or at the e-mail addresses [info@hotelcabrera.it](mailto:info@hotelcabrera.it) / [amministrazione@hotelcabrera.it](mailto:amministrazione@hotelcabrera.it) or telephone numbers 0932 777070 - 091 331865. The Privacy Contact Person you may contact to exercise your rights under the EU REG. is the company DPO: Luigi Amaddio.

Since the installation of Cookies and other tracking systems operated by third parties through the services used within this Website cannot be technically controlled by the Owner, any specific reference to Cookies and tracking systems installed by third parties is to be considered indicative. To obtain complete information, the User is invited to consult the privacy policy of any third party services listed in this document.

Given the objective complexity of identifying technologies based on Cookies, the User is invited to contact the Data Controller should he or she wish to receive any further information on the use of Cookies through this Website.

## **DEFINITIONS AND LEGAL REFERENCES**

### **Personal Data (or Data)**

Personal data is any information that identifies or makes identifiable, directly or indirectly, a natural person and that can provide information on his or her characteristics, habits, lifestyle, personal relationships, state of health, economic situation, etc.

### **Usage Data**

Sono le informazioni raccolte automaticamente attraverso questo Sito Web (anche da applicazioni di parti terze integrate in questo Sito Web), tra cui: gli indirizzi IP o i nomi a dominio dei computer utilizzati dall'Utente che si connette con questo Sito Web, gli indirizzi in notazione URI (Uniform Resource Identifier), l'orario della richiesta, il metodo utilizzato nell'inoltare la richiesta al server, la dimensione del file ottenuto in risposta, il codice numerico indicante lo stato della risposta dal server (buon fine, errore, ecc.) the country of origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (e.g. the length of time spent on each page) and the details of the itinerary followed within the Application, with particular reference to the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

### **User**

The individual who uses this Website which, unless otherwise specified, coincides with the Data Subject.

### **Data Subject**

The natural person to whom the personal data refer.

### **Data Controller (or Owner)**

The natural person, public authority, company, public or private body, association, etc., which makes the decisions on the purposes and means of processing (Article 4(1)(7) of EU Regulation 2016/679), including the security measures relating to the operation and use of this Website. The Data Controller, unless otherwise specified, is the owner of this Website.

**Data Controller (or Processor)**

The natural or legal person whom the Controller requires to perform specific and defined tasks of management and control on its behalf of the processing of data (Article 4(1)(8) of EU Regulation 2016/679).

**This Website (or this Application)**

The hardware or software tool by which Users' Personal Data is collected and processed.

**Service**

The Service provided by this Website as defined in the relevant terms (if any) on this website/application.

**European Union (or EU)**

Unless otherwise specified, any reference in this document to the European Union shall be deemed to include all current member states of the European Union and the European Economic Area.

**Cookie**

A small file stored on users' devices that enables the storage of preferences and other information used on web pages visited.

**About Me**

Provides access to the 'About me' section of the profile.

**Legal references**

This privacy policy is drafted on the basis of multiple legislative orders, including Articles 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise stated, this privacy policy relates exclusively to this Website.