

PRIVACY POLICY

This information is provided pursuant to art. 13 of EU Regulation 679/2016 by **FIN CORETUR SRL**, having its registered office in Via Piersanti Mattarella 20 - 90141 Palermo and local unit c/o Hotel Conte di Cabrera in Contrada Maganuco - 97015 Modica (RG), n. q. of Data Controller.

We inform you that your personal data are used in compliance with the principles of correctness, lawfulness, transparency, protection and confidentiality of the same and of their rights, as established by the Regulations.

This *website* complies with the *Https* security protocol, adopting security measures that minimise the risks of destruction or loss of data, unauthorised access or processing that is not permitted or does not comply with the purposes of collection as indicated in our *Privacy Policy*.

We invite you to check that the device from which you connect is equipped with appropriate *software* to protect network data transmission (e.g. up-to-date *antivirus* and *browser software*).

1. TYPE OF DATA PROCESSED

The personal data that we collect belongs to users, owners, employees, representatives or other persons acting on behalf of a travel provider or other business partner; depending on the specific situation, it is

Identification data: name/surname, date of birth

Contact data: e-mail address, telephone and fax number

Financial and/or banking data: bank account number, VAT number, credit notes, necessary for payment and invoicing

Other information that may be collected automatically on this website are: language settings, IP address, location, device settings, operating system, time of use, requested URL, browsing history, type of data displayed, etc.

Finally, below is additional information that we receive from other sources:

insolvency information: we may receive information from insolvency practitioners, courts or other public authorities relating to a Business Partner.

Data relating to requests from law enforcement and tax authorities: law enforcement or tax authorities may contact us with further information about Business Partners in the event that they are affected by an investigation.

Fraud detection: in some cases, and as permitted by applicable law, we may need to collect data through third party sources for fraud detection and prevention purposes.

2. PURPOSE OF DATA PROCESSING

The purposes of data processing on this website are:

- A. Account registration and administration (use of account, financial and contact data for registration, verification or business relationship management purposes)
- B. Customer service (support service, how to respond to user requests, questions and concerns)
- C. Marketing activities and newsletters (newsletter subscription, sending information regarding promotional activities. Please note that a link to unsubscribe will be included in the messages)
- D. Messaging tools (to forward information or questions about bookings to guests or communicate using, for example, e-mail aliases, which always include the Hotel Conte di Cabrera as the recipient)
- E. Analysis, improvement and research (invitations to participate in surveys, market research to improve the quality of services offered)
- F. Security, fraud detection and prevention (*fraud, phishing, spam*, etc.)
- G. Legal information and compliance (to manage and resolve legal disputes or to enforce agreements with business partners or resolve a complaint with a booking party in a reasonable manner)
- H. Submission of applications by interested users in the 'Work with us' section

3. LEGAL BASIS

For the purposes referred to in letters A and B, Hotel Conte di Cabrera relies on the legal basis that the processing of personal data is necessary for the performance of the existing commercial contract.

For the purposes referred to at letters C, D and E, Hotel Conte di Cabrera shall require your explicit consent, since these are purposes that are additional to the activity mainly carried out.

For the purposes at letters F and G, Hotel Conte di Cabrera relies on compliance with legal obligations.

4. METHODS OF DATA PROCESSING

The processing of the user's personal data shall be based on the principles of lawfulness, correctness and transparency, protecting confidentiality in accordance with the principles set out in Article 5 of the EU REG. The data are processed at the Controller's premises and in any other place where the parties involved in the processing are located. Processing may be carried out on paper and also with the aid of electronic or otherwise automated means. The user's personal data are processed using appropriate technical and organisational security measures in accordance with Art. 32 of the EU REG, so as to guarantee an adequate level of security and to minimise the risks of destruction or loss, unauthorised access or processing that does not comply with the purposes of collection.

5. CATEGORIES OF RECIPIENTS

Without prejudice to communications made in compliance with legal and contractual obligations, users' data may be disclosed to the following categories of recipients, appointed in writing and given specific instructions regarding processing: employees authorised by Hotel Conte di Cabrera; management and data processing platforms; IT service providers, consultants and freelancers, including in associated form, in their capacity as external data processors.

6. RETENTION PERIOD

In compliance with precise legislative and contractual obligations, the user's data will be processed for as long as is necessary to carry out the existing business relationship.

They will also be appropriately archived for the next 10 years from the date of their acquisition in order to guarantee the exercise of control activities to the bodies in charge.

The data will be immediately deleted or processed anonymously, if their retention is not otherwise justified.

Finally, if you have any questions about a specific retention period for certain types of personal data that we process about you, please contact us using the contact details below.

7. IDENTITY AND CONTACT DETAILS OF THE DATA CONTROLLER

The Data Controller is Fin Coretur s.r.l. with registered office 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** or at the e-mail addresses **info@hotelcabrera.it** / **amministrazione@hotelcabrera.it** or telephone numbers **0932 777070 - 091 331865**. The Privacy Contact Person to whom you may refer to in order to exercise the rights provided for by the EU REG. and listed in point 6 below is the company DPO: Luigi Amaddio.

8. RIGHTS OF THE DATA SUBJECT

Pursuant to Articles 15-22 of Reg. EU 679/2016 GDPR and national legislation, the data subject may, in the manner and within the limits provided for by current legislation, exercise the following rights to request confirmation of the existence of personal data concerning him/her (right of access); to know its origin; to receive intelligible communication of it; to obtain information about the logic, methods and purposes of the processing; to request the updating, rectification, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including data no longer necessary for the pursuit of the purposes for which it was collected; in cases of processing based on consent, to receive their data provided to the data controller, in a structured and machine-readable form and in a format commonly used by an electronic device; the right to lodge a complaint with the Supervisory Authority.