

## **Privacy Information Notice pursuant to EU General Data Protection Regulation no. 679/2016**

Dear Sirs,

We would like to inform you that EU General Data Protection Regulation 2016/679 provides protection for individuals and other subjects regarding the processing of personal data (GDPR). Confidentiality is another essential component of our work philosophy and this is why, and not only in order to fulfil legal obligations, we are providing the information reported below.

### **1. WHAT PERSONAL DATA DO WE PROCESS**

We process the personal data of clients, suppliers and subjects who have voluntarily communicated their data and precisely:

- data (general information, personal data, residence, telephone, address of residence and e-mail address, photo, films, details of an identity document, including photocopy of the identity document, tax code, data referring to family members and their guests in the event of a stay by the same, credit card details, details requested in order to satisfy special requirements of the client, his/her guests, his/her guide) provided on paper, by e-mail or via the web, directly by the client or by third parties who have organised or offered the client a stay at our facility;
- data referring to the period or the timetable of the stay at our facility
- data referring to the services requested or utilised, including data referring to any celebration of matrimony
- data originating during the stay (special needs of the client processed by personnel assigned to satisfying them, requests and booking made at the reception or via the reception, photos, films etc.)
- data referring to the subject who has organised or offered the client the stay at our facility (travel agency, wedding planner, services company, tour operator)
- data referring to visited sites and transactions carried out on internet associated to the IP address used by the client/guest (web surfing log) in the case of the use of the service for access to internet via Wi-Fi. More specifically such data will be kept for at least 6 months and will remain at the disposal of the Police Authorities to whom they may be communicated with regard to activities connected to the prevention or repression of crimes. Such data may be associated to the client exclusively through specific procedures which will only be activated on the request of the relevant Authority.
- in the case of payment by credit card or cheque, a photocopy of the identify document may be requested and acquired in guarantee of the correct identification of the client. This document will be kept, unless there are different requirements, until the payment has been made successfully and until expiry of the deadline available for any disputes.

### **2. WHO IS THE DATA CONTROLLER**

**Tenimenti Malenchini s.r.l.** (with registered offices in Bagno a Ripoli (FI), via Lilliano e Meoli n. 82, e-mail address: info@medicivilla.com) is the Data Controller. When the reception service is provided at the hotel structure called "La Corte" the Co-Data Controller is **Azienda Agricola Malenchini di Malenchini Diletta, Agriturismo** (with headquarters in Bagno a Ripoli (FI), via Lilliano e Meoli n. 89, e-mail address: info@malenchini.it) which will process the data for the purposes stated in this Privacy Information Notice.

An updated list of Data Controllers and Appointees is kept at the headquarters of the Data Controller/Co- Data Controller.

### **3. WHAT IS THE SOURCE OF THE PERSONAL DATA**

Personal data are collected mainly directly from the parties concerned or via a subject acting on their behalf (e.g. wedding planner, travel agency, guides, tour operator) at the time of the request for an estimate and/or information, booking, check-in and during the stay at our facility, and every time the person concerned has voluntarily communicated his data.

#### **4. WHAT ARE THE PURPOSES FOR PERSONAL DATA PROCESSING**

The personal data are processed exclusively for fulfilments connected to the economic activity of the company. In particular:

A) without the express consent of the person concerned for the following Service Purposes: 1) executing the reception service and operations resulting from it or executing one or more agreed contractual operations; 2) fulfilling obligations deriving from laws, provisions and regulations, including the obligation relating to the communication of guests to the Police Authorities; 3) sending estimates and offers to interested parties who have requested such a service; 4) offering the clients careful and personalised service during their stay at our facility including the booking of external services; 5) processing of the data of underage children over which the guest exercises responsibility as a parent for the sole purpose of being able to carry out the registration service as provided by obligations deriving from laws, provisions and regulations; 6) entering of personal details in the company's computer databases; 7) issue of invoices and credit notes; 8) processing of internal statistics; 9) management of collections and payments; 10) exchange of communications concerning the economic, administrative and commercial activity of the company; 11) exercising the rights of the Data Controller/ Co-Data Controller, for example, the right to defence in court:

B) only after receiving the specific and separate consent of the person concerned: 1) for Marketing Purposes consisting in sending newsletters, corporate information communications, advertising material on products or services offered by the Data Controller, Co-Data Controller or by Third Parties (e.g. business partners) via the postal address or e-mail address; 2) for Marketing Purposes consisting in the publication on social networks, on the internet site, e-mail, printed paper, of photos and videos showing the person concerned during the event organised at our facility; 3) for the Purpose of Service to allow the celebration of matrimony or civil union at our facility in the presence of the official Register of the Municipality.

#### **5. WHAT IS THE LEGAL BASIS**

The legal basis for the processing of data is given by the specific existing contractual relationship and by the specific free and informed consent of the person concerned.

#### **6. PERSONAL DATA PROCESSING MODALITIES**

Personal data are subject to processing both on paper and using electronic and/or automated means guaranteeing the most absolute confidentiality.

The Data Controller/Co-Data Controller shall process the personal data for the time strictly necessary for fulfilling the Service Purposes indicated in point 4) in observance of civil and fiscal legislation and in any case for no longer than 10 years from collection and for no longer than 5 years from collection for the Marketing Purposes indicated in point 4).

#### **7. OBLIGATION TO PROVIDE DATA AND THE CONSEQUENCES OF REFUSING TO PROVIDE DATA**

It is obligatory to provide data for the Service purposes mentioned in point 4). If such data is not provided we will not be able to guarantee the services. Instead, the provision of data for marketing purposes is optional. The person concerned can therefore decide whether or not to provide any data or refuse the possibility of processing already-provided data at a later date: in such a case, he will not be able to receive newsletters, courtesy communications, assessment questionnaires concerning the products or services provided by the Data Controller/Co-Data Controller and/or advertising material on products or services offered by the Data Controller/Co-Data Controller or by Third Parties (e.g. business partners). In any case he will continue to be entitled to the services mentioned in art. 4).

#### **8. WHO HAS ACCESS TO THE DATA**

The data can be made accessible to:

- all subjects who have been recognised the right of access pursuant to regulatory provisions

- Azienda Agricola Malenchini di Malenchini Diletta, Agriturismo with headquarters in Bagno a Ripoli, in via Lilliano e Meoli n. 89, as Co-Data Controller for the processing of the data and/or supplier of goods and services
- employees, co-workers, agents, and suppliers of the Data Controller/Co-Data Controller
- third parties (e.g., providers for the management and maintenance of the web site, suppliers of goods or services, institutes of credit, professional businesses, suppliers of the service of sending newsletters, advertising material, etc.) who carry out activities on an outsourcing basis on behalf of the Data Controller/Co-Data Controller, in their capacity of external data controllers;
- factoring companies, credit recovery companies, producers or companies granting user licences for any provided services or products;
- post offices, carriers and couriers for sending documentation or material.

## **9. WHO ARE THE RECIPIENTS OF THE DATA**

Without your express consent the Data Controller/Co-Data Controller may communicate your data for the Services purposes mentioned in art. 4) to supervisory authorities, judicial Authorities and all other subjects to whom communication is obligatory by law for the carrying out of said purposes. Your data may be communicated to banks, credit institutes, data processing companies and credit card issuing companies, for activities strictly connected to the execution and administrative management of the contract and for fiscal, accounting, assistance, insurance, computer systems managements, financial services fulfilments. Your data will not be circulated.

It is our duty to remind you that the facility has many communal areas where guests or visitors take videos and photographs in which other guests or visitors could appear and which will later be published, for example, on social networks.

## **10. TO WHOM MAY THE DATA BE TRANSFERRED**

The personal data will be managed and kept on servers located within the European Union by the Data Controller/Co-Data Controller and/or third party companies appointed and duly nominated as data controllers. The data shall not be transferred outside the European Union. In any case it is understood that should it be necessary, the Data Controller/Co-Data Controller will be entitled to move the location of the servers in Italy and/or the European Union and/or extra-EU Countries. In such a case, the Data Controller/Co-Data Controller guarantees henceforth that the transfer of data to outside the EU will take place in compliance with applicable laws stipulating, if necessary, agreements which guarantee a level of adequate protection and adopting the standard contractual clauses provided by the European Commission.

## **11. VIDEO SURVEILLANCE**

We would like to point out the presence of a video-surveillance system duly indicated by specific notices in the supervised areas on which the presence of a video-recording system is also indicated. The images may be displayed in real time by Data Controller for the purpose of promptly identifying any situations of risk for the safety of the guests; more particularly, the systems are installed for the purpose of supporting personnel in security and access control activities, for protection from possible damages, thefts or illegal removal of goods, in order to guarantee the safety of personnel and guests making it possible to record situations of particular danger or accidents and to allow the reconstruction of the dynamics of significant events in order to protect the safety of persons or of crimes perpetrated against clients, guests or the facility and its personnel.

In addition to that reported above, any video-recordings produced by the system, which are periodically cancelled in full compliance with privacy protection laws, may be utilised to fulfil the provisions issued by Legal Authorities and/or by the Judicial Police, in order to enforce or defend a right also on the part of a third party, possibly to complete the documentation accompanying the reports of claims made to insurance companies.

## **12. WHAT RIGHTS DOES THE PERSON CONCERNED HAVE**

You may ask the Data Controller/Co-Data Controller at any time for information about the existence and characteristics of the personal data processing, for the correction or cancellation of the same and limitation of the processing. You may also object to the processing and request that the data should be sent to another controller. The Data Controller and the Co-Data Controller are obliged to reply to the requests in the times established by law and to correct erroneous data, integrate incomplete data and update inexact data, and if requested, cancel the data and limit and exercise its rights. The person concerned may make a complaint also to a control authority.

## **13. MODALITIES FOR EXERCISING RIGHTS**

The person concerned may exercise his rights at any time by sending:

- a registered letter with receipt of delivery Tenimenti Malenchini s.r.l., with registered offices in Bagno a Ripoli (FI), via Lilliano e Meoli n. 82 or an e-mail to the address [info@medicivilla.com](mailto:info@medicivilla.com)
- a registered letter with receipt of delivery to Azienda Agricola Malenchini di Malenchini Diletta, Agriturismo, with headquarters in Bagno a Ripoli, in via Lilliano e Meoli n. 89 or an e-mail to the address [info@malenchini.it](mailto:info@malenchini.it)

## **14. COMPLAINTS**

Without prejudice to any other administrative or jurisdictional appeal, we inform you that, if you believe that the processing concerning you breaches this regulation, you are entitled to make a complaint to a control authority (Data Protection Authority) , specifically in the member State in which you usually reside, work or of the place where the presumed breach has occurred.