

## **DATA PROTECTION POLICY**

The purpose of this document is to inform natural persons (hereinafter “**Data Subjects**”) regarding the processing of personal data collected by the Data Controller, Consorzio Turistico Limonese [Limone sul Garda Tourism Consortium] having its registered office at Via IV Novembre 29/1 - Limone sul Garda (BS), Italy, VAT No. 02629000981, (hereinafter “**Data Controller**”) on the website [visitlimonesulgarda.com](http://visitlimonesulgarda.com).

### **1. Categories of Personal Data processed**

The Data Controller processes the following types of Personal Data provided voluntarily by the Data Subject:

- **Contact details:** forename, surname, address, email address, telephone number, any further information given by the Data Subject, etc.

Failure by the Data Subject to provide Personal Data for which a legal or contractual obligation exists, or where such data constitute a necessary requirement for conclusion of the contract with the Data Controller, shall result in the impossibility for the Data Controller to establish or continue the relationship with the Data Subject.

A Data Subject who provides the Data Controller with Personal Data pertaining to third parties shall be directly and exclusively liable for the origin, collection, processing, disclosure or dissemination of said data.

### **2. Legal basis and purposes of the processing**

For purposes of commercial marketing by email: the processing of the Personal Data is necessary on the basis of the legitimate interests pursued by the Data Controller and on the basis of consent by the Data Subject;

For processing and fulfilment of requests from the website: the personal data are processed without prior express consent pursuant to Article 6 (1)(b) GDPR;

On the basis of the legitimate interests of the Data Controller, the website permits interaction with external platforms whose personal data processing is regulated by their respective data protection notices, to which the reader is referred.

Additionally, the Data Subject’s Personal Data may be used by the Data Controller to defend itself in any legal proceedings before competent legal authorities.

### **3. Methods of processing and recipients of the Personal Data**

The processing of the Personal Data is performed using paper-based and computerised systems with organisational methods and logics strictly connected to the purposes indicated and following adoption of appropriate security measures.

Personal Data are processed exclusively by:

- persons authorised by the Data Controller who have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;

- parties who operate independently as separate data controllers or parties designated as data processors by the Data Controller in order to perform all processing activities necessary to pursue the purposes set forth in this notice (e.g. commercial partners, consultants, IT companies, service providers, hosting providers);
- parties or entities to whom the Personal Data must be disclosed by law or by order of the authorities.

The parties listed above are required to use appropriate safeguards to protect the Personal Data and can access only the Personal Data necessary for performance of their assigned duties.

The Personal Data shall not under any circumstances be disclosed indiscriminately.

#### **4. Transfer of data**

The management and retention of Personal Data shall take place on servers located within the European Union. The data shall not be transferred outside the European Union. In any event, where necessary, the Data Controller shall have the right to move the location of the servers within Italy and/or the European Union and/or to non-EU countries. In that event, the Data Controller hereby guarantees that the transfer of data outside the EU shall take place in compliance with all applicable legal provisions, where necessary, entering into agreements which ensure an adequate level of protection and/or by adopting the standard contractual clauses provided by the European Commission.

#### **5. Period of retention of the Personal Data**

The Personal Data shall be retained for the period of time necessary to fulfil the purposes for which such data was collected, in particular:

- for purposes relating to the legitimate interests of the Data Controller, the data shall be retained until such interests are fulfilled
- for purposes based on the Data Subject's consent, the data shall be retained until revocation of consent

At the end of the retention period, all Personal Data shall be deleted or retained in a form which does not allow identification of the Data Subject.

#### **6. Rights of the Data Subject**

In your capacity as Data Subject, you have the rights pursuant to Article 15 GDPR and specifically the following:

1. to obtain confirmation of the existence or otherwise of personal data concerning you;
2. to obtain information regarding: a) the origin of the personal data; b) the purposes and methods of processing; c) the logic applied in the event of processing performed using electronic devices; d) identity of the data controller, data processors and designated representative pursuant to Article 3(1) GDPR; e) the parties or categories of party to whom the personal data may be disclosed or who may become aware of the data in their capacity as designated representative in Italy or as processors or persons authorised to process personal data;

3. to obtain: a) updating, rectification or, where there is an interest, supplementation of data; b) the deletion, anonymisation or blocking of data unlawfully processed, including data whose retention is not necessary for the purposes for which the data was collected or subsequently processed c) certification to the effect that the operations referred to at points a) and b) above have been brought to the attention, also with respect to the content, to the entities to which the data has been communicated or disclosed, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
4. to object, in whole or in part: a) for legitimate reasons, to the processing of personal data concerning yourself, even if pertinent to the purpose of collection; b) to the processing of personal data concerning yourself for the purpose of sending advertising materials or direct marketing or for the performance of market research or commercial communications. Where applicable, you also have the rights set forth in Articles 16-21 GDPR (right to rectification, right to erasure, right to restriction of processing, right to portability of contractual and raw navigation data, right to object) and also the right to complain to the Data Protection Authority.

## **7. Methods for exercising the rights**

You may exercise your rights at any time by sending an email, fax or registered letter with return receipt to the Data Controller.

email: [info@limonehotels.com](mailto:info@limonehotels.com)

PEC certified email: [limone.info@sicurezzapostale.it](mailto:limone.info@sicurezzapostale.it)

## **8. Data Controller, processors and persons authorised to process personal data**

The Data Controller is Consorzio Turistico Limonese.

The updated list of the processors is held at the registered office of the Data Controller.