PRIVACY POLICY

Pursuant to Articles 12 et seq. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, "Regulation" or "GDPR"), and generally in compliance with the principle of transparency provided for by the Regulation itself, the following information is provided regarding the processing of Personal Data (i.e. any information concerning an identified or identifiable natural person: "Data Subject") carried out in connection with the use of the website Capo d'Uomo ("Website").
This information therefore concerns the processing of personal data carried out both during browsing and in any interaction of the user with Consorzio Gitav, through communications or through the use of services, including via the reserved area.
Should the User use links present on the Website to interact with third parties (for example social media), the latter will operate as Data Controllers of the User's data processed by them from that point onwards; Users are therefore invited to read their respective privacy policies on the processing of personal data which they are required to provide.
For data processed in the Work with us section, please refer to the specific policy.
During the availability check procedure, and subsequent possible confirmation of the booking, the request data will be transmitted to the company for which the User made the relative request.

SUMMARY TABLE OF MAIN INFORMATION

Purposes (point 2)	**Data categories (point 3)**	**Legal basis (point 4)**	**Duration (point 5)**	**Communications to parties other than employees or Data Processors (point 6)**
Website functioning and security For other purposes related to cookies, please refer to the Cookie Policy	Browsing Data	Legitimate interest of the Controller in business activity and security	No longer than 24 hours	No
Contractual (offers and sales; assistance)	Common data such as personal details, contact details, reference company, login credentials, etc.	Necessity to take pre-contractual measures at the request of the Data Subject or performance of contracts to which the Data	Statute of limitations of rights; Should the request not be followed by the conclusion of a contract, or the	Facilities to which the availability request or purchase made refers

		Subject is party. Legitimate interest in legal protection.	information does not have contractual value, personal data will not be deleted by the end of the tourist season;	
Direct marketing	Common data such as name, telephone number, e-mail address; data relating to the opening of promotional e-mails detected via tracking pixels (opening occurred, date and time, IP address, device type and mail program)	Consent (single consent for sending promotional e-mails and for the tracking pixel; revocable even for tracking alone)	No longer than 48 months from consent or its renewal	No

For all processing of personal data carried out through cookies, please refer to the specific policy.

1. **DATA CONTROLLER AND CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)** The data controller (i.e. the entity that determines the purposes and means of the processing of personal data) is Consorzio Gitav (hereinafter also the Controller), Consorzio Gitav, with registered office in via Pontedera 5 – 00161 ROME, Tax Code and VAT No. 14983601007, PEC gitav@pec.it
   For contacts specifically relating to the protection of personal data, including the exercise of rights referred to in point 8 below, please refer in particular to the e-mail address: info@gitav.com to which you are kindly requested to address your requests.
   The Controller has appointed a Data Protection Officer, who can be contacted at the e-mail address dpo@gitav.com

2. **PURPOSES OF PROCESSING** Personal data may be processed for the following purposes:

2.1 the proper functioning and security of the Website (**Website functioning purpose**); other types of cookies (in particular analytical) are also used, which are therefore non-necessary, for which please refer to the specific policy.

2.2 sales services management, including the formulation of offers, and customer support (**contractual purpose**);
2.3 the promotion and sale of products carried out through letters, telephone, automated communication systems, e-mail, etc., including the detection, via tracking pixels embedded in promotional e-mails, of the opening of messages by the individual recipient, to measure and improve the effectiveness of communications (for example by adapting their content, frequency and subsequent sends), and market research and customer satisfaction surveys (**direct marketing purpose**);

3. TYPES OF DATA PROCESSED AND COLLECTION METHODS The data subject to processing belong to the category of common data, such as those indicated below.
With reference to the contractual purpose, personal details, data connected to the purchase made and relative payment, including payment instruments, will be processed in particular.
The systems and software used to operate the Website collect some personal data whose transmission is implicit in the use of Internet communication protocols ("**Browsing Data**", e.g. IP addresses or domain names of computers used by users connecting to the Website, URI - Uniform Resource Identifier - addresses of requested resources, time of request, method used in submitting the request to the server, file size obtained in response, numerical code indicating the status of the response given by the server - successful, error, etc. - and other parameters relating to the user's operating system and IT environment). Although this information is not collected to be associated with identified data subjects, by its very nature, through processing and association with data held by third parties, it could allow users to be identified and is therefore considered Personal Data. In connection with the browsing information collected, we also remind you to read our Cookie Policy.
We will also process data provided by the User or otherwise resulting from their interaction with the Website, including via chat, the contact section or the sending of messages by the User, such as:

- name, surname, contact details, number and age of family members or other travelers; of interest.

With reference to the direct marketing purpose, promotional e-mails sent by the Controller contain a tracking pixel, i.e. a tiny, invisible image hosted on a remote server and automatically downloaded upon opening the message (if the Data Subject's mail program loads images). Through the pixel, the Controller, via the provider of the dispatch platform indicated in point 6, detects the opening of the individual e-mail, with date and time, and receives technical data transmitted by the Data Subject's device (IP address, device type and mail program). The pixel does not allow reading the content of the Data Subject's correspondence.

4. OBLIGATORY OR OPTIONAL NATURE OF DATA PROVISION AND LEGAL BASIS OF PROCESSING As mentioned, the transmission of Browsing Data is inherent to the use of the Website and the legal basis for processing Personal Data for the purpose of Website functioning is the relative legitimate interest of the Controller in conducting its business activity, also with reference to security and protection against abuse.
The provision of data requested in connection with the services of the Website, including sales, and information provided in contact communications by the User is optional and failure to provide them will have the sole consequence that it may be impossible for the User to use the services or for the Controller to provide the requested answers. The legal basis for processing such data is, pursuant to Article 6(1)(b) GDPR, the necessity to respond to requests from the User of a pre-contractual or contractual nature (e.g. requests for information on products or quotes; configuration of purchased products).
As regards direct marketing purposes, the provision of personal data is optional and any failure to provide them will have no consequence regarding the contractual relationship or the possibility of using the Website's services. Such processing is carried out only with the recipient's consent (in this scope consent is also required for legal entities), which is always revocable (see point 8 below “Rights of the Data Subject”), which constitutes its legal basis. Consent to sending promotional communications via e-mail includes, with a single expression of will, also the use of the tracking pixel described in point 3; the Data Subject may at any time withdraw consent solely for tracking, continuing to receive e-mails without pixels, or withdraw consent as a whole. It is specified that withdrawal of consent or objection to processing carried out through automated contact methods (automated calling systems or communication of calls and electronic communications carried out via e-mail, messaging) extends to traditional ones (paper mail, operator-assisted call), but the possibility remains reserved to exercise this right only in part, objecting, for example, solely to the sending of promotional communications via automated systems or solely to the use of the tracking pixel.

5. PROCESSING METHODS AND DATA RETENTION PERIODS
Processing will be carried out:

- through manual and automated systems;
- by personnel specifically authorized and instructed to fulfill the relevant duties;
- using adequate measures to ensure data confidentiality and prevent access by unauthorized third parties.

With specific reference to the marketing purpose, it is particularly highlighted that Personal Data will also be processed through:

- the use of automated calling or call communication systems;
- electronic communications carried out via e-mail (with tracking pixel, unless consent is withdrawn), messaging;
- the use of operator-assisted telephone and paper mail.

Browsing data is deleted – except in the case of detection of illegal activity – no later than 24 hours from collection.
For marketing purposes, data will be processed for a period not exceeding 48 months from consent or its renewal.
Data relating to Website services will be retained for the time necessary to provide the service and verify its execution; ordinarily, therefore, data will not be retained beyond 6 months following the use of the service.
Data connected to a contractual relationship will be retained for its entire duration and at the end – limited to data necessary at that point – for the fulfillment of all legal obligations and for protection requirements, including contractual, connected to or arising from it; ordinarily, therefore, data will not be retained beyond 10 years from the termination of the contractual relationship.

6. COMMUNICATION OF DATA

During the availability check procedure, the request data will be transmitted to the company for which the User made the relative request.
The collected data may in any case be communicated, exclusively for the purposes specified above, to:

- all entities to whom the right of access to such data is recognized under regulatory provisions;
- collaborators, suppliers of the Controller, within the scope of their respective duties and/or contractual obligations relating to the execution of the contractual relationship with data subjects; among the suppliers of the Controller, banking and credit institutions, insurance companies, legal advisors, shipping managers, software and related assistance providers are listed by way of example; in particular, our software infrastructure for Website operations and related customer relations is also managed through Cookiebot™ (cookies), We4guest – AMG s.r.l. (newsletter service, including tracking pixel management) and Zucchetti Group (bookings via simplebooking.it) which act as our Data Processors. You may in any case request a complete and updated list of entities appointed as Data Processors by contacting one of the Controller's contact details indicated in this policy.

Data is not subject to dissemination.

7. PLACE OF DATA PROCESSING

Personal Data will be processed within the European Union, and there is no intention to transfer them outside this territory.

8. RIGHTS OF THE DATA SUBJECT

The GDPR grants the Data Subject the exercise of the following rights regarding personal data concerning them (the brief description is indicative; for the complete statement of rights, including limitations thereof, please refer to the Regulation, and in particular to Articles 15-22):

- access to personal data (the Data Subject has the right to obtain free information regarding personal data concerning them held by the Controller and relative processing, as well as to obtain a copy thereof in an accessible format);
- rectification of personal data (upon notification by the Data Subject, correction or integration of personal data – not expression of evaluative elements – that are incorrect or inaccurate, including those that have become so because they are not updated);
- erasure of personal data ("right to be forgotten") (for example, data is no longer necessary in relation to the purposes for which it was collected or processed; it has been unlawfully processed; must be erased to comply with a legal obligation; the Data Subject has withdrawn consent and there is no other legal basis for processing; the Data Subject objects, conditions permitting, to the processing);
- restriction of processing (in certain cases – contestation of data accuracy, for the time necessary for verification; contestation of processing lawfulness with objection to erasure; necessity of use for defense rights of the Data Subject, while they are no longer useful for processing purposes; if there is an objection to processing, while necessary verifications are carried out – data will be stored in such a way that it can possibly be restored, but, in the meantime, cannot be consulted by the Controller except precisely in relation to verifying the validity of the restriction request by the Data Subject, or with the Data Subject's consent or for the establishment, exercise or defense of legal claims in court or to protect the rights of another natural or legal person or for reasons of important public interest of the Union or a Member State);
- objection in whole or in part, for reasons connected to the Data Subject's particular situation, to processing carried out on the basis of legitimate interest; to object to processing for marketing or profiling purposes, you will not even need to justify your decision;
- data portability (where processing is based on consent or a contract and is carried out by automated means, upon request, the Data Subject will receive in a structured, commonly used and machine-readable format, personal data concerning them and may transmit them to another Data Controller, without hindrance from the Data Controller to whom they were provided and, if technically feasible, may obtain that said transmission be carried out directly by the latter).

Furthermore, where processing takes place by virtue of consent (see point 4 above), it will be possible to withdraw consent at any time, without affecting the lawfulness of processing based on consent before withdrawal (as indicated in point 4 above, with reference to data processing for marketing purposes, consent to processing may also be withdrawn for only one of the communication methods, traditional or automated, or limited solely to the use of the tracking pixel in e-mails, continuing to receive promotional communications without pixels). The easiest way to express withdrawal of consent will be the link at the bottom of our communications or the personal panel in the reserved area of the Website. The link at the bottom of every e-mail leads to a preference center in which, with two distinct choices, it is possible to disable tracking via pixel alone or cease receiving promotional communications altogether, without any limitation in the use of the Controller's services.

The Data Subject also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) if they consider that the processing concerning them violates the provisions of personal data protection legislation; the Garante is contactable via the contact details provided on the Authority's website “www.garanteprivacy.it”. In any case, we would like to have the opportunity to address in advance any perplexity of Data Subjects, who may contact the e-mail address info@gitav.com or the other contact details of the Controller or DPO indicated above for any clarification regarding the processing of personal data concerning them and for exercising relative rights, including withdrawal of consent.