

PRIVACY POLICY

SOCIALTURIST S.r.l.

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Phone: +39 0861 797515

1) GENERAL INFORMATION

We wish to inform you that the European Regulation 2016/679 (hereinafter GDPR) establishes rules relating to the protection of natural persons with regard to the processing of personal data and the free movement of such data, in order to protect the fundamental rights and freedoms of natural persons, in particular the right to the protection of personal data. The free movement of personal data within the Union cannot be restricted or prohibited for reasons related to the protection of natural persons with regard to the processing of personal data. According to the abovementioned GDPR, "personal data" means any information relating to you, directly or indirectly, with particular reference to an identifier such as the name, an identification number, location data, an online identifier or to one or more elements specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. The management methods of the site are described in relation to the processing of personal data of users who consult it and who have access to the reserved area. This is an information that is also provided pursuant to articles 13-14 of the GDPR for those who interact with the web services of the Data Controller (see following point 2), accessible electronically at the following addresses: www.rivanuova.it www.rivanuova.com

This privacy policy is provided solely for sites referable to the Data Controller and not for other websites that may be consulted by the User via links. Following consultation of this site, data relating to identified or identifiable persons may be processed. Following consultation of this website, data relating to identified or identifiable persons may be processed. The purposes of this information are:

- A) to establish some minimum requirements for collecting personal data online and, in particular, the methods, timing and nature of the information that the data controllers must provide to users when they connect to web pages, regardless of the purpose of the link;
- B) to provide the Data Subject with all the information on the personal data processed by the Data Controller, even when such data is collected from the Data Subject.

The processing of personal data connected to the web services of this site takes place both at the Data Controller's offices and at the offices identified by the website manager and are handled exclusively by personnel authorized to the processing or by persons tasked with occasional maintenance. No data obtained from the web services will be disclosed. The personal data provided by users who send requests for material (or even just information) will only be used for the performance of the requested service and will only be shared with third parties if this is necessary for the stated purpose. The collection and processing of personal data will take place in accordance with the general principles of lawfulness, fairness, relevance, and non-excessiveness.

2) CONTROLLER'S DATA

The identity of the Data Controller and his references, also reported in the header, are:

SOCIALTOURIST Srl (hereafter the Data Controller)

Address: Martinsicuro (TE) – 6, via dei Pioppi

Email: info@rivanuova.com Certified email: socialturst@pec.rivanuova.it

Phone: +39 0861 797515

The Data Controller does not carry out activities requiring the mandatory appointment of a Data Protection Officer.

3) PURPOSES OF THE TREATMENT

- a) operate this website;
- b) fulfill questions and provide the information requested directly by the Data Subject¹ and to contact him/her regarding services provided by the Data Controller²; communications regarding reservations, quotes, etc. will be made via email and/or using messaging services (sms, whatsapp, etc.);
- c) perform the service requested by the Data Subject, collected through online forms found on the website, proceed to the booking service, or to the online check-in service (if applicable) with the consequent obligation of communication by law provided for by the T.U.L.P.S.;
- d) necessary activities, including the operational, administrative and account management activities, such as registrations and communications required by law;
- e) for market research and statistical purposes, in anonymous form;
- f) sending promotional/commercial/informative communications related to offers of services/products and/or events promoted by the Data Controller (by fax, e-mail, SMS and MMS or other messaging systems);
- g) subscription to the newsletter service;
- h) accessory services made available by the Data Controller for which the consent of the Data Subject is required (including but not limited to forwarding of calls, messages, correspondence, communication of their presence during visits by external parties, etc);
- i) publication on the Data Controller's website and/or on any other means of communication (social networks, etc) of images, photos, videos taken by this organization or by third parties, concerning recreational or leisure activities taking place inside our village, or for promotional purposes concerning this village.

4) LEGAL BASIS

GDPR art. 6 paragraph 1 point b, c, f:

b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;

c) processing is necessary for compliance with a legal obligation to which the controller is subject;

¹ The optional, express and voluntary sending of email messages to the addresses contained in this site implies the subsequent acquisition of the sender's address, required to reply to any request, as well as of other personal data contained in the message.

² Art 130 paragraph 4 legislative decree dated 30 June 2003, no. 196 and subsequent amendments and supplements

f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

GDPR art. 6 paragraph 1 point a:

a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

5) TYPES OF DATA PROCESSED³

SITE USERS (points 3 a-c):

point a): only the personal data necessary for browsing the site or for using web services are processed;

point c): filling a registration form involves the automatic acquisition of identification and contact data (name, e-mail). If the user provides further data, in addition to those explicitly requested through the "message" field of the form, they will be acquired and processed in full compliance with the regulations and, if exceeding the purposes of processing, they will be deleted.

FACILITY USERS (points 3 b-d):

point b): identification and contact data (name, surname, telephone, e-mail). If the user provides further data in addition to those explicitly required by email and/or letters, they will be collected and processed in full compliance with the law and deleted if exceeding the purposes of data processing;

point d): contact or tax data (name, surname, telephone, email, tax code, bank details, means of payment, etc.);

point f): identification and contact data (name, surname, telephone, email...);

point g): personal contact data (email);

point h): personal, identification and contact data (name, surname, telephone, email...);

point i): identification data (photos, images, videos with or without audio).

6) NATURE OF THE PROVISION

Apart from what has been specified for navigation data, the User is free to provide personal data contained in the appropriate electronic request forms.

The provision of the requested data by the User is optional but any refusal to provide them, may make it impossible:

- to obtain a response to any requests;
- to fulfill the obligations necessary for the execution of the contract of which the interested party is a party and for the execution of pre-contractual measures adopted at the request of the same.

The need for consent is excluded for the pursuit of the purposes referred to in point 3 letters a-b-c-d-e.

Only exclusively with the express consent of the interested party (optional and

³ Only and exclusively if necessary and functional to the proper fulfillment of the purposes indicated in point 3) may personal data qualified as special (personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a natural person's sex life or sexual orientation) be processed, including those of family members and others, including data of children. In these cases the legal basis is article 9 paragraph 2 point a of the GDPR

revocable at any time).

The need for consent is mandatory for the pursuit of the purposes referred to in point 3 letters f-g-h-i.

7) PROCESSING METHODS

WEBSITE: The computer systems and software procedures used to operate the platform of this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is collected to be associated with the Data Subject party who decides to register in the reserved area (ACCOUNT) and who voluntarily decides to use this method to take advantage of the services, products and any other kind of request that the owner of the treatment, or its commercial partners, are able to offer. This category of data includes IP addresses (for verifying the reliability of the Data Subject and for security purposes) or the domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource notation Identifier) of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and IT environment of the Data Subject.

DATA ACQUIRED BY OTHER METHODS: The personal data being processed, including those collected from the Data Subject, will be processed manually and/or electronically and will be stored in specific paper and/or electronic files. The paper and electronic documents will be correctly maintained and protected for as long as necessary using appropriate security measures, so as to minimize the risks of destruction or loss, unauthorized access or processing that does not comply with the purposes of the collection.

There is no automated decision-making process and no profiling is carried out.

8) COOKIES

Cookies are used, which are small files stored on the computer's hard drive and are used to provide services and/or information. Most cookies are "session cookies" and are therefore deleted from your hard drive at the end of the session (when you log out or close your browser). They may be present on some pages of the site in order to analyze access to web pages, personalize its services, content and advertising messages, measure the effectiveness of promotions and guarantee trust and security.

The so-called session cookies used on this site avoid the use of other IT techniques potentially prejudicial to the privacy of users' browsing and do not allow the acquisition of personal identification data of the Data Subject.

9) DATA STORAGE – DATA TRANSFER TO A THIRD COUNTRY

The data provided will be stored:

- *browsing the site:* the data collected are used for the sole purpose of obtaining anonymous statistical information on the use of the site(s) and to check their correct functioning and are deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site(s): except for this eventuality, the data on web contacts do not persist for more than 7 days;
- *administrative/accounting purposes:* for the period foreseen by the tax and civil

regulations (10 years from the issue/receipt of the invoice: Art. 2220 cc by virtue of which the "records must be kept for ten years from the date of the last registration");

- *purpose of supply of the service/good*: for the period foreseen in the service contract or, if not indicated, for a maximum of 5 years from the supply of the good/service;
- *Marketing purposes and sending newsletters*: until the consent given is revoked, until the right of opposition is exercised and in any case no later than 5 years from collection.

Personal data will not be disclosed, and will be destroyed when we no longer need or are obliged to keep them, nor transferred to a third country, unless following the express consent of the interested party.

10) RECIPIENTS OR CATEGORIES OF RECIPIENTS OF THE DATA

Communication to the identified recipients will take place only if they are involved and functional in achieving the purposes referred to in point 3 above, therefore the personal data collected and processed may be:

- a) made available to the Data Controller's Collaborators, as Managers or persons authorized to process personal data;
- b) disclosed to third parties, natural or legal, public administrations, professionals, law enforcement agencies, government agencies, regulatory bodies, courts or other public authorities authorized by law;
- c) disclosed to commercial partners (with the prior consent of the Data Subject, if not involved and functional to achieving the purposes);
- d) if necessary, transferred to another Data Controller in accordance with the provisions of the GDPR, also with regard to the right to data portability.

The list of Personal Data Processors is available at the headquarters of the Data Controller.

11) CONNECTION TO SOCIAL MEDIA

INTERACTION WITH SOCIAL NETWORKS: by using the buttons that may be present on our site(s), the Data Subject allows the contents to be shared on the SN using social media plug-ins (e.g. Facebook Like button). In this case, the IP address of your device may be transmitted to the social media provider and processed by them.

(The legal basis for the use of technologies is article 6 co. 1 letter f GDPR as they are used to increase the visibility of our website/s.)

12) SUBJECT'S RIGHTS

We inform you that, as an interested party, you have all the rights provided for by the articles. from 15 to 22:

- The Data Subject has the right to obtain from the Data Controller confirmation as to whether or not personal data concerning him or her are being processed, and, in this case, to obtain access to the personal data and the following information: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular if recipients are from third countries or international organisations; d) when possible, the expected retention period of personal data or, if this is not possible, the

criteria used to determine this period; e) the existence of the right of the Data Subject to request the Data Controller to rectify or erase personal data or limit the processing of personal data or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) if the personal data are not collected from the Data Subject, any available information on their origin; h) the existence of automated decision-making process, including profiling, referred to in Article 22, paragraphs (1) and (4) and, at least in those cases, significant information on the logic used, as well as the significance and expected consequences of such processing for the Data Subject.

- The existence of the right to portability of data, including all available information on its origin; to also obtain the cancellation of personal data concerning him or her without unjustified delay pursuant to art. 17 ("right to be forgotten").
- If the processing is based on Article 6, paragraph 1, letter a), or on Article 9, paragraph 2, letter a), the existence of the right to withdraw consent at any time without prejudice to the lawfulness of the processing based on the consent given before its withdrawal.
- The right to lodge a complaint with a supervisory authority.
- Have a copy of the personal data being processed from the Data Controller, provided that it does not prejudice the rights and freedoms of others; in case of further copies requested by the Data Subject, the Data Controller may charge a reasonable fee based on administrative costs. If the request is received by electronic means, and unless otherwise indicated, the information is provided in a commonly used electronic format.

The above information will be provided:

- within a reasonable period after obtaining the personal data, at the latest within one month, taking into account the specific circumstances in which the personal data are processed;
- in the event that the personal data are intended for communication with the Data Subject, at the latest at the time of the first communication to the Data Subject; or if communication to another recipient is envisaged, no later than the first communication of the personal data.

All the rights of the Data Subject provided for by the GDPR are exercised with a request addressed without formalities to the Data Controller, also through a person in charge, to which suitable feedback is provided without delay.

Document updated as of 14/02/2025