

PRIVACY POLICY

SOCIALTOURIST Srl

Address: 6, via dei Pioppi

Contact: info@rivanuova.it Phone +39 0861.797515 – Fax +39 0861.797516

Web: www.rivanuova.com

The European Regulation 2016/679 (GDPR) establishes rules on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in order to protect the fundamental rights and freedoms of natural persons, and the right to the protection of personal data in particular. The free movement of personal data within the Union cannot be restricted or prohibited for reasons connected with 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, in particular referring to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Moreover, it describes how the website is managed with regard to the processing of personal data of all the users who visit it or have access to the restricted area. This privacy policy complies with articles 13-14 of GDPR concerning all the users who interact with the web services of SOCIALTOURIST Srl, that can be accessed at the web address:

www.rivanuova.com

This privacy policy only refers to websites referred to SOCIALTOURIST Srl. It does not refer to other websites that users possibly visit through links. After visiting this site, information concerning an identified or identifiable person can be processed. This policy is valid even if personal data are collected through other means (coupons or other).

This policy aims at identifying the minimum requirements for collecting personal data online. In particular, it aims at identifying methods, times and nature of the data that the controller has to provide to the users when they visit web pages, regardless of the purpose of their visit.

1. CONTROLLER'S DATA

The controller's data and contact details, indicated in the header, are the following:

- SOCIALTOURIST Srl
- Address: Martinsicuro (TE) – 6, via dei Pioppi
- Contact details: email info@rivanuova.it Phone +39 0861.797515 – Fax +39 0861.797516

2. PURPOSES

All the data collected through this website are processed at the offices of the Controller, at the offices of the website administrator and are only handled by authorized personnel or occasionally by personnel in charge of site maintenance. No data concerning the web service will be disclosed. All personal data provided by users who require material about the service required (or require information) are only used to answer the user's requests and will be disclosed to third parties only if necessary or if these third parties are involved in answering such requirements.

The user's personal data will be collected and processed in accordance to the general principles of lawfulness, fairness, relevance, and non-excessiveness, as stated in the conditions of use, and in particular all data will be processed:

- A. To answer questions and provide information required by the user (sending optionally, explicitly and voluntarily emails to any email address provided in this site entails acquiring the sender address, essential to answer any requirement, and any other personal data contained in the email); to contact the user with reference to any service provided by SOCIALTOURIST Srl or by its commercial partners;
- B. To receive curricula, both paper and electronic format, spontaneously sent by candidates interested in cooperating with SOCIALTOURIST Srl;
- C. To sign up to the “NEWSLETTER” service. If the user provides personal data to subscribe to such service, these data will be only used to send newsletter and will not be disclosed to third parties;
- D. For compulsory registrations and communications, among which those in compliance with T.U.L.P.S., and for safety and security purposes of guests inside our village (included online check in directly made by the user);
- E. For necessary activities, including the operational, administrative and account management activities, in particular some data will be used for compulsory registrations and communications;
- F. To measure customer satisfaction with regard to the services provided and any other request, through personal or phone interviews, emails or SMSs;
- G. To fulfil legal obligations established by Legislative Decree 231/2007 concerning anti-money laundering for preventing and combating money laundering and terrorist financing;
- H. With previous consent of the data subject, through traditional means (post or telephone calls) or automated means (emails, SMSs, MMSs, etc) for commercial/promotional activities such as commercial messages, sales, publicity material or for marketing research concerning the services provided (including but not limited to: updates about offers and promotions about the services provided by SOCIALTOURIST Srl and third parties, programs and promotions (online too), to award or win the loyalty of potential customers);

Legal basis: Civil Code, Consumer Code

¹ any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her

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3. LAWFULNESS OF PROCESSING

Processing is being lawful since at least one of the following applies:

- Art. 6, paragraph 1, letters 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;
 - f) processing is necessary for the purposes of the legitimate interests pursued by the controller (such as, for example, to prevent frauds to the detriment of our website; as stated in Art 47 of GDPR, the processing of personal data for direct marketing purposes may be regarded as carried out for a legitimate interest) 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.
- Art. 9, paragraph 2, letters a, e, f
 - a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;
 - e) processing relates to personal data which are manifestly made public by the data subject;
 - f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Legal basis: Civil Code, Criminal Code, Consumer Code

4. RECIPIENTS OF PERSONAL DATA

Personal data will be disclosed to identified recipients (if involved) for the purposes stated in point 2. Therefore, personal data collected can be:

- a) Used anonymously for statistical or research purposes;
- b) Given to authorized personnel from the Data Controller, acting as Supervisors or persons authorized to processing personal data;
- c) Given to third persons (natural or legal), Public Administration, professionals, police force, governmental bodies, regulatory agencies, courts or other public authorities authorized by law;
- d) Given to commercial partners, only if the user gives previous and explicit consent;
- e) If necessary, transferred to another controller according to GDPR, even concerning data portability.

The list of Controllers and Processors is available at the Controller's offices.

5. CATEGORIES OF PERSONAL DATA

- f) The categories of personal data processed (exclusively in case they are necessary to comply correctly with the purposes stated at point no. 2) may be:
- g) personal data revealing racial or ethnic origin, political opinions, religion or philosophical beliefs, trade union membership, and the processing of genetic data, data concerning health or data concerning sex life;
- h) personal data of family members and other subjects, among which minors' data, etc.

6. RETENTION OF PERSONAL DATA

Data provided for the above-mentioned purposes will be kept:

- For administrative/accounting purposes: no longer than established by Tax or Civil Law;
- For marketing purposes and to send newsletters: until withdrawal of consent, until the user exercises the right to object or in any case no longer than 15 years from collection.

Will not be disclosed and will be destroyed as soon as we no longer need them or are no longer compelled to store them;

7. PROCESSING ARRANGEMENTS

The information systems and software procedures relied upon to operate this web site acquire personal data as part of their standard functioning; the transmission of such data is an inherent feature of Internet communication protocols.

This data category includes the IP addresses, and/or the domain names of the computers and terminal equipment used by any user, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of such requests, the method used for submitting a given request to the server, returned file size, a numerical code relating to server response status (successfully performed, error, etc.), and other parameters related to the user's operating system and computer environment. These data are exclusively used to extract anonymous statistical information on service usage and to check its functioning. The data could be used to ascertain responsibility in case of hypothetical computer crimes against the Site: except for this possibility, the data on web contacts are stored no longer than 7 days.

Personal data will be processed:

- Manually and/or electronically and will be stored in paper and/or electronic archives. Paper and electronic documents will be properly stored and protected for as long as necessary using suitable security measures, in order to limit the chance of destruction or loss, of unauthorized access or treatment not complying to the purposes of the collection.
- There is not automated decision-making process nor user profiling.

8. COOKIES

This site uses cookies. Cookies are small text files stored on your hard disk and are used to provide services and information. Most cookies are "session cookies" and are therefore deleted from your hard disk at the end of the session (as soon as you disconnect or close your browser). They enable some pages to analyse the flow of information; customize the services, content and advertising we offer; measure promotional effectiveness; and promote trust and safety.

Session cookies used on this site avoid the use of other computer techniques that are potentially detrimental to the confidentiality of user browsing and do not allow the acquisition of personal identification data of the user. Further details are available at our cookie policy specific section.

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9. DATA SUPPLY

Apart from the data required for surfing, the user is free to supply the personal data requested in specific registration forms if they wish to receive services, products or any other communications from the site manager or its commercial partners. Failure to supply said data could mean it is impossible for us to answer your requests or provide services, products or any other communications from the site manager or its commercial partners

RESERVED AREA:

- automatically involves acquisition of personal data such as:
 - Pages visited and date and time of browsing;
 - IP protocol and internet domain;
 - Search engine (if any) through which the user accessed the site;
 - Operating system and type of browser.

Failure to supply said data could mean it is impossible to enter the reserved area.

10. SUBJECT'S RIGHTS

Please note that your rights are stated by Articles 15, 16, 17, 18, 20, 21, 22 of GDPR:

- The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, 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 recipients in third countries or international organisations; (d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; (e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; (f) the right to lodge a complaint with a supervisory authority; (g) where the personal data are not collected from the data subject, any available information as to their source; (h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- The data subject shall have the right to obtain from the controller the access, the rectification or the erasure of personal data concerning him or her, their restriction of processing and is entitled to object to the processing of any personal data. The data subject also has the right to data portability, including all information available concerning their origin. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay as stated in Article 17 ("right to be forgotten").
- Where the processing is based on Article 6, paragraph 1, letter a), or on Article 9, paragraph 2, letter a), the data subject shall have the right to withdraw his or her consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.
- The right to lodge a complaint with a supervisory authority.
- The data subject shall obtain a copy of the personal data undergoing processing, provided it does not prejudice the fundamental rights or freedoms of others. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.

Such information will be provided:

- within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed.
- if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

All of the rights stated in the GDPR may be exercised with an informal request to the owner or controller of the data, even through an appointed subject. The controller shall acknowledge the request without delay.