

## **PRIVACY POLICY PURSUANT TO ARTS. 13 AND 14 OF EU REGULATION 2016/679**

Pursuant to Regulation (EU) 2016/679 (hereinafter GDPR), this page describes the methods of processing the personal data of users who consult the Valdichiana Living website accessible electronically at the following address: [www.valdichianaliving.it](http://www.valdichianaliving.it)

1. DATA CONTROLLER The data controller is: Strada del Vino Nobile di Montepulciano e dei Sapori della Valdichiana Senese. For any information or to exercise the rights provided for by EU Regulation 679/2016, you can contact the data controller at the following addresses: Piazza Grande, 7 - Montepulciano (SI); Email [stradavinonobile@pec.it](mailto:stradavinonobile@pec.it)

2. TYPES OF DATA PROCESSED AND METHODS OF DATA PROCESSING The User's data may be processed with IT and analogue systems capable of managing, transmitting and storing the data with logic strictly related to the purposes of the processing. The treatment will be carried out in compliance with the security, organisational, technical and physical and logical measures aimed at preventing the alteration, destruction, loss, theft and improper or illegal use of the data. The data are processed exclusively by personnel authorized to process them, according to the principles of correctness, lawfulness, transparency, pertinence and non-excess with respect to the purposes of collection and subsequent processing. The Owner does not make use of any automated decision-making process.

Navigation data The computer systems and software procedures used to operate the Site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified interested parties, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are not, nor will they be used in any case by the Data Controller to carry out profiling activities.

Data provided voluntarily by the user In particular: a. e-mail address and other personal data that may be contained in e-mail messages sent to the addresses indicated on the Site and/or in the related attachments, in order to carry out the processing activities necessary to respond to user requests; b. name and e-mail address provided for marketing purposes such as: periodic information communications (newsletter), information or promotional material by means of direct marketing tools, elaboration of statistics and market research; c. personal data possibly contained in the messages sent to the direct messaging systems of the social media channels of the Data Controller, in order to respond to user requests; d. personal data, identification data, address, contact and billing data provided for the booking and purchase of services, in order to complete the contract and fulfill the obligations deriving from it.

Cookies and other tracking systems This information concerns online pages and services that can be reached via hypertext links that may be published on the site and refer to resources external to the Valdichiana Living domain

Valdichiana Living uses technical, analytical and profiling cookies in order to collect and store information to identify the user's browser or device and collect and store information when the User interacts and/or purchases the services offered. For more information, visit our Cookie Policy at the bottom of this statement.

Social Media Regarding the processing of personal data carried out by the managers of the Social Media platforms used by Valdichiana Living, please refer to the information provided by them through their respective privacy policies. Valdichiana Living processes the personal data provided by users through the pages of the dedicated Social Media platforms for the purposes set out in this disclosure, exclusively to manage interactions with users (comments, public posts, etc.) and in compliance of the legislation in force.

The processing of personal data of users of Valdichiana Living's social media channels complies with the policies in use on the platforms used.

Personal or sensitive data entered in public comments or posts within social media channels may be removed. The data shared by users through private messages sent directly to the channel managers will be treated in compliance with current regulations on the protection of personal data and this information on the processing of personal data.

**3. PURPOSE OF THE TREATMENT** The User's personal data will be processed <for the following purposes: a) processing of pre-contractual measures for services requested by the User; b) response to requests for information sent by the User; c) finalization of the contract and management of relations with the Customer; d) fulfillment of specific Customer requests; e) provision of the Tour Operator service (booking of means of transport - plane, ships and ferries, road or rail transport -; accommodation booking; booking of activities and experiences); f) invoicing and related accounting and/or tax obligations; g) fulfillment of legal obligations to which the Data Controller is subject; h) obtain statistical information on the use of web services; i) check the correct functioning of the services offered; j) k) Carrying out marketing activities: such as the elaboration of statistics and market research, sending newsletters or other information and promotional material relating to the activities, products and services of Valdichiana Living, sending surveys to improve the service ("customer satisfaction"). These communications may be made via automatic messages, via e-mail, via text message/MMS, by paper mail and/or by using the telephone with an operator; it should be noted that the Data Controller collects a single consent for the marketing purposes described here, pursuant to the General Provision of the Guarantor for the Protection of Personal Data "Guidelines on promotional activities and the fight against spam", of 4 July 2013; if, in any case, you wish to oppose the processing of your data for marketing purposes carried out with the means indicated here, you can do so, at any time, according to the methods set out in paragraph 8 of this information;

**4. LEGAL BASES OF THE TREATMENT** The legal basis of the treatment, identified from time to time, will be:

- consent-art.6-par.1, lett. a)-Reg.UE679/16;
- the execution of the contract and/or pre-contractual measures-art.6-par.1,lett.b)-EU Reg.679/16;
- fulfillment of legal obligations-art.6-par.1, lett. c)-EU Reg.679/16;
- the legitimate interest-art.6-par.1, lett. f)-Reg.UE679/16.

It is possible to request clarifications regarding the concrete legal basis of each treatment, as well as to provide more information regarding the legitimate interest pursued, by contacting the Data Controller at the addresses indicated in point 1 of this information.

**5. MANDATORY OR OPTIONAL NATURE OF THE PROVISION OF DATA** The provision of the User's personal data for the purposes referred to in point 3, letters from a) to g) of this information, is mandatory since it is necessary for the correct establishment and execution of the contractual relationship and for the execution of the obligations arising from it, as well as to respond to User requests. The provision of data may be mandatory to fulfill or to require the fulfillment of legal obligations. Any refusal to provide personal data Sending commercial communications via e-mail regarding products and services similar to those purchased by you, unless you expressly refuse to receive such communications, which you may express during the purchase phase or on subsequent occasions (so-called Soft spam);

or to consent to their treatment determines the impossibility to establish the contractual relationship or to give correct execution to the same. The provision of User data for the purposes referred to in point 3 lett. h) and i) is mandatory, as it is necessary for browsing the website. The provision of User data for the marketing purposes referred to in point 3 lett. j) and k) is optional, however necessary in order to receive newsletters, commercial communications, advertising material relating to the services offered by the Data Controller.

6. DURATION OF TREATMENT The user's personal data, acquired for the purposes referred to in point 4 of this information, will be kept for the time necessary to pursue the purposes in question and for a time equal to the contractual duration, in compliance with the times prescribed by law, and/or

The navigation data does not persist for more than seven days (except for any need for the investigation of crimes by the judicial authorities). Once these terms have elapsed, the Data will be destroyed or made anonymous.

7. RECIPIENTS AND DATA TRANSFER Where necessary, the User's personal data may be shared with: a) subjects delegated and/or appointed by the Data Controller - i.e. companies or professional firms that provide assistance and consultancy in the IT sector, payroll and contribution processing, as well as tax and legal consultants - to carry out activities strictly related to the pursuit of the aforementioned purposes, rightly appointed as Data Processors; b) domain administrators: the domain administrator and/or third-party resellers who provide assistance in using the service may have access to the personal data of the interested parties; c) persons authorized to process personal data who are committed to confidentiality or have an appropriate legal obligation of confidentiality; d) social security, welfare and tax institutions, credit institutions, insurance companies; e) transport service providers, accommodation service providers, service providers related to activities and experiences, limited to the organization of the tour operator activities purchased by you; f) subjects, bodies or authorities to whom the communication of your personal data is mandatory by virtue of provisions of law or regulation or orders of the authorities, or for reasons of public interest. It is possible to request precise information about the subjects who process the data on behalf of the owner by making an explicit request to the contacts referred to in point 1 of this information. Personal data is stored on servers located within the European Union and can be transferred to EU countries and/or to third countries with respect to the EU, within the scope of the purposes referred to in the introduction, in compliance with the provisions of Applicable law, subject to the stipulation of the standard contractual clauses envisaged by the European Commission. Personal data are not subject to disclosure.

8. RIGHTS OF THE INTERESTED PARTIES Interested parties have all the rights provided for by EU Regulation 679/2016, namely:

- the right to ask the owner for access to personal data, i.e. to know which data the owner processes (Article 15);
- the right to obtain rectification, ie the right to have one's data modified if they have changed (art.16);
- the right to limit the processing that concerns him, ie to limit the use of the data by the data controller (art. 18);
- the right to object, for legitimate reasons, to their treatment (art.21);
- the right to data portability, i.e. the right to receive all personal data processed by the owner in a structured and readable format on computer support (art. 20);
- the right to request the cancellation of one's data from the owner (art.17);
- the right to revoke the explicit consent previously given at any time, without prejudice to the lawfulness of the processing carried out up to that moment (Articles 7 - 13);
- the right to lodge a complaint with the Guarantor for the protection of personal data in the event of violations of the law (art. 77).

To exercise your rights, you can refer to the contact details of the Data Controller referred to in point 1 of this information. the legal obligations to which it is subject.

The User can revoke his consent and/or oppose the receipt of commercial communications, including those relating to products similar to those previously purchased (so-called Soft Spam), at any time according to the methods indicated in paragraph 8 of this information. for the period necessary to allow the Data Controller to protect its interests and / or fulfill In relation to the purposes referred to in point 3 lett. j) and

k) -marketing - the user's data will be kept until the purposes of the processing have been pursued or until the consent is revoked.

9. CHANGES The Data Controller reserves the right to update the Information at any time and make users aware of it through the use of the most appropriate tools, for any further information or question it is possible to refer to the contact details of the Data Controller.