#### PRIVACY POLICY

Dear Customer,

pursuant to the current legislation on the protection of personal data (EU Reg. 2016/679 - GDPR and Legislative Decree 196/2003 and subsequent amendments and additions), we wish to inform you that the processing of your personal data is carried out correctly and transparency, for lawful purposes and protecting your privacy and your rights.

Therefore, in compliance with the aforementioned legislation, we provide you with the following information:

#### **Processing methods.**

The treatments are carried out both by electronic means (including through our website: www.campingarrighi.it) and with the aid of paper means for the performance of the services offered.

#### Nature of the data processed.

If you register among our contacts or if you request news or buy our products / services, we will process your personal and fiscal data, as well as economic data that are necessary for the conduct of relations between you and our Company. Generally, we do not process any sensitive or judicial data, but if this becomes necessary we will do it only by first asking for your consent.

#### Purposes of processing and related legal bases.

The Data Controller processes personal and identification data only for the purpose of carrying out the services offered.

The main service offered consists in acquiring and confirming your booking of accommodation services and managing your subsequent stay at our accommodation, with the consequent provision of any additional services requested. In the management of payments, your data may be disclosed to third parties, banking and financial. Since these are necessary treatments for the definition of the contractual agreement and for its subsequent implementation, your consent is not required, except in the case in which data belonging to particular categories are provided, as per art. 9 EU Reg. 2016/679. In case of refusal to provide personal data, we will not be able to confirm the reservation or provide you with the requested services (Article 6, paragraph 1, letter a) EU Reg. 2016/679). The processing will cease upon your departure, but some of your personal data may or must continue to be processed for the purposes and in the manner indicated in the following points:

- a) speed up the registration procedures in case of subsequent stays at our facility;
- b) provide the ancillary services offered by the Structure: management of transfers from / to airport / boats; management of the documents necessary to obtain the stay;
- c) manage any needs related to accessibility, through information collected from the data subject relat-ing to health, with reference to any physical needs (for example in the case of limited mobility);
- example in the case of limited mobility);
  d) send our promotional messages and updates on the rates and offers made;
  e) publish photographs and filming that portray her within the structure on social networks (Facebook, Instagram, YouTube and Twitter) for advertising and promotional purposes (Article 6, paragraph 1 of EU Reg. 2016/679). For the purposes listed, your consent is required, which can be revoked at any time, pursuant to art. 6, par. 1, lett. a) and art. 7 EU Reg. 2016/679. Your data will also be processed to fulfill the obligation set out in the Consolidated Law on Public Safety (Article 109 RD 18.6.1931 n.773) which requires us to communicate to the Police Headquar-ters, for purposes of public security, the details of the clients staying., according to the procedures established by the Ministry of the Interior (Decree of 7 January 2013) and insertion of data on the re-cestat site as required by law. The provision of data is mandatory and does not require your consent (Article 6, paragraph 1, letter c) EU Reg. 2016/679), and in case of refusal to provide them we will not

be able to host you in our structure. In addition, your data will also be processed for the fulfillment of legal obligations of an accounting and tax nature. For these purposes, the processing is carried out without the need to acquire your con-sent (Article 6, paragraph 1, letter c) EU Reg. 2016/679). The data are processed by us and by our representatives and are communicated externally only in compliance with legal obligations. In case of re-fusal to provide the data necessary for the aforementioned obligations, we will not be able to provide you with the requested services. The data acquired for these purposes are stored by us for the time re-quired by current legislation (10 years and even longer in the case of tax assessments).

In some cases, the overriding interest of the data controller may exist, if, for example, there is a breach of contract by the counterparty, such as to induce the holder to give rise to a procedure for the recov-ery of the credit. In such cases, it is not necessary to obtain your consent pursuant to art. 6, par. 1, lett. f) EU Reg. 2016/679.

#### Duration of treatment.

The data are processed until the activities for which they were collected are completed and also afterwards, in compliance with legal obligations and for administrative and commercial purposes, subject to the adoption of adequate guarantees.

### Data voluntarily provided by the interested party.

In the event that you choose to make the payment in one of the forms provided (bank transfer, credit cards, debit cards and cash), in addition to the data requested in the contact form (name and e-mail), you will be required to give us all the data necessary for the completion of these practices. Failure to communicate even only some of these data makes it impossible to perform the service.

The express and voluntary sending of data by filling in the contact form and / or sending emails to the addresses indicated on our website entails our subsequent acquisition of the same data. All the requested data, name and surname, e-mail, telephone and address, are necessary for us to respond to your requests and / or fulfill the service you require. Specific summary information is prepared and / or displayed on the individual pages of the site used for the performance of particular services on request.

## Obligation or right to provide data and consequences of any refusal.

The data listed above - name and surname, e-mail, telephone and address - are necessary for us to be able to carry out the requested services: their failure to provide them in whole or in part consequently makes it impossible to give place to the execution of the service itself.

While browsing our site, or during your telephone contacts or even in the case of a direct visit, you may be asked to also communicate additional data that are not strictly necessary for the fulfillment of the main service (offer of accommodation services and stay), but they become so for the execution of any ancillary services (management of transfers from / to airport / boats; management of the documents necessary to obtain the stay; provision of other services) that will be represented from time to time. Failure to provide them is assessed on a case-by-case basis, and determines the resulting decisions according to the importance we recognize to the data requested but not provided by you.

Whenever we intend to offer you an ancillary service, the specifically pursued purposes will be described promptly and your express consent will be requested. Failure to provide the data required for a specific service or the failure to issue the relative and consequent consent to their use does not affect the possibility of requesting and consenting to the provision of other various accessory services (nor, much less, prevents or excludes the main service).

## Communication and dissemination of collected data.

The data collected are not "disseminated" by us (with the exception of the images published on social networks), in other words, they are not disclosed to indeterminate subjects in any way, including by making them available or consulting; they can, however, be "communicated" by us, ie they are given knowledge to one or more specific subjects, in particular to:

- subjects who can access the data in compliance with a legal obligation, within

the limits established by the law itself;

- the credit and / or financial institution, if payment by electronic money is required;
- the partner companies, if consent has been given to the sending of advertising and the carrying out of direct marketing by the same;
- the companies identified by us for the execution of the required ancillary services.

# The rights of the interested party (articles 13/22 and 77/79 of EU Regulation 2016/679)

If the interested party intends to exercise the rights referred to in Articles 13/22 and 77/79 EU Reg. 2016/679 in relation to your personal data or if you have other questions or requests also on this privacy policy, you can contact the Data Controller through the contact details indicated on the Site or using our contact details:

#### Data controller: ARRIGHELBA s.r.l. in the person of the legal representative Vito Tammone

registered office: Loc. Barbarossa 17 - 57036 Porto Azzurro (LI)

CF. and VAT number: 00713950491

e-mail: info@arrighelba.it PEC: arrighelbasnc@pec.it

The Data Controller declares its willingness to satisfy the requests of the interested party, however it warns that it is not always possible to physically delete information relating to interactions that have taken place and any past transactions and / or bookings.

Interested parties may exercise certain rights with reference to the data processed by the Data Controller.

In particular, the interested party has the right to:

- withdraw consent at any time. The interested party can always revoke the consent to the processing of their personal data previously expressed (Article 13, paragraph 2, letter c) EU Reg. 2016/679);
- oppose the processing of their data. The interested party may object to the processing of their data in the cases referred to in art. 21 EU Reg. 2016/679;
- access their data. The interested party has the right to obtain information on the data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the data processed (Article 15 of EU Reg. 2016/679);
- verify and ask for rectification. The interested party can verify the correctness of their data and request its updating or correction (Article 16 of EU Reg. 2016/679);
- obtain the limitation of the processing. When certain conditions are met, the interested party may request the limitation of the processing of their data. In this case we will not process the data for any other purpose other than their conservation (Article 18 of EU Reg. 2016/679);
- obtain the cancellation or removal of their personal data. When certain conditions are met, the interested party may request the cancellation of their data by the Data Controller (Article 17 of EU Reg. 2016/679). In these cases, we will certainly cancel as soon as possible;
- receive their data or have them transferred to another owner (data portability). The interested party has the right to receive their data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain their unhindered transfer to another owner. This provision is applicable when the data are processed with automated tools and the processing is based on the consent of the interested party, on a contract of which the interested party is a party or on contractual measures connected to it (Article 20 of EU Reg. 2016/679 );
- not be subjected to a decision based solely on automated processing, including profiling, in cases where the exercise of the right is permitted (Article 22 of EU Reg. 2016/679);
- propose a complaint. The interested party can lodge a complaint with the competent personal data protection supervisory authority (Article 77 of EU Reg. 2016/679);
- act in court (Article 79 EU Reg. 2016/679).