

# PRIVACY

## LEGAL AND PRIVACY INFORMATION

This page describes the management method of the site with reference to the treatment of personal information of the users who consult it, and their right to privacy and confidentiality. It regards information included in the law art. 13 del D. Lgs. n. 196/2003 - Code for the Protection of Personal Data of those who interact with web services of Hotel Villa Orchidea, accessible through telematic means at web address:

<http://www.villaorchidea.com>

corresponding to the home page of the official site of Hotel Villa Orchidea, with legal headquarters in 38069 Torbole (TN - Italy), via Strada Granda n. 7.

### **Type of information processed and aims of the treatment.**

The site offers content of an informative and interactive type. During navigation of the Site, the Company can, therefore, acquire information on the user, or more generally, the visitor, in the following ways:

#### 1. Voluntarily supplied information to the site from the client/visitor of the site

Personal information, which you freely make available to us by choice for the use of the Service, is treated in the realm of normal activity of the Company, and in particular, for the execution of obligations derived from concluded contracts or by law (ex. Administrative matters, taxes, accounting, etc.) inherent to the business relationships between us.

#### 2. Navigation information and cookies

The information systems and software procedures involved in the operation of this site acquire, in the course of their normal operation, including through cookies, some personal data for which the transmission is implicit in the use of Internet communication protocols.

This information is not collected to be associated with identified interests, but by their nature they could, through processing and association with data held by third parties, be used to identify users.

In this category, information includes IP address, browser type, operating system, domain name and address of websites from which access and exit has been

performed, information on pages visited by the user within the Site, hours of access, length of time spent on each page, analysis of navigation within and other parameters relative to the operative system and informational environment of the user.

Such data of a technical/informatic nature will be registered in an anonymous form and only used to allow access to the Site and/or the fruition of some Services, and then canceled, or rather, they will be collected and utilized in an associated and anonymous manner for the purpose of:

1. improving the quality of service and streamline the functionality of the Site;
2. Understanding user behaviors for the purpose of improving online communications;
3. providing statistical information regarding the use of the Site.

### 3. Geolocation information

After prior consent of the user, the Site can treat localization data - in a manner which is not continuous - for the delivery of services required by the user.

#### Method of treatment

With regard to the rules of the data processing, please note that your data will be processed through automated tools and/or manually, and, in particular, inserted into a special archive registry, in both printed and electronic form. Without prejudice to the application of appropriate security measures for the protection and confidentiality of data, adhering to the Code for the Protection of Personal Data, the processing of your personal data will be carried out through appropriate programs for processing and data storage, and for the time strictly necessary to achieve the purposes for which they were collected, and, in any case, in regulatory compliance.

#### Technologies - Cookies

The cookies used are text files that the Site transfers to the computer of the user which allow and facilitate navigation.

As explained above, cookies also register information relative to the navigation of the user; such information is not registered in an individual form, and does not, therefore, interfere with the privacy and confidentiality of the user (without altering your right to deactivate such cookies, cd. Analytics).

This site also uses cookies for the creation of profiles that are used to send promotional messages in line with your known preferences, learned during navigation of the Site and internet. All information relative to your consent to the use of cookies is contained in the Cookie Policy of the Company.

All users have the right to deactivate cookies through the procedure defined in the Cookie Policy of the Company.

Compulsory or optional nature of the conferment of data.

The conferment of your personal information is necessary (and, therefore, your consent is not required, according to art. 24 of the Code) to the extent that they are used for the execution, on the part of the Company, of contractual obligations or of law relating to the Services. Outside of these cases, you will be asked for the consent for the use, by the Company, of your personal data.

Your personal information can also be used, without the need for prior consent, where the address data from public registers, lists, documents or documents that are available to anyone, in any case, to the exclusion of its diffusion, where the treatment is performed to enforce or defend the right of the Company in the courts.

Refusal to supply fundamental personal information for the use of Services (name, surname, company name, legal headquarters, operational headquarters, any secondary headquarters, company capital, telephone number, fax number, name of legal representative, personal or corporate tax ID number, company sector, bank information, etc.) can lead to the impossibility of providing Services and, therefore, to establish or continue relations of a contractual nature.

Categories of subjects to which information may be communicated.

Your personal information may be communicated to the following categories of subjects:

- Persons to whom the right of access to the same data is granted by laws or regulations;
- Credit Institutions for the management of cash receipts and payments, financial, insurance and auditing institutions;
- Collection agencies;
- Data processing companies and computer services;
- Companies that provide the service of sending correspondence;
- Related companies, subsidiaries or parent companies of society.

Categories of subjects that may be aware of your personal data and carry out the processing.

Your personal information will be processed by the following categories of people:

- Management of the company, those responsible for, or charged with the processing of information;

- Employees of the operational headquarters who are responsible for the processing of information;
- Management of the hotels, those responsible for, or charged with, the processing of information
- Reception staff, directors and treasurer's office of facilities managed by the Company charged with the processing of information.

Information may not be object of diffusion without your expressed consent.

Categories of subjects who may become aware of your information.

Your personal information will be processed by the following categories of people:

- Management of the company, those responsible for, or charged with, the processing of information;
- Employees of the operational headquarters who are responsible for the processing of information;
- Management of the hotels, those who are responsible for, or charged with, the processing of information;
- Reception staff, directors and treasurer's office of facilities managed by the Company charged with the processing of information.

Information may not be object of diffusion without your expressed consent.

Rights referred to in art. 7 of D. Lgs. 196/2003.

In relation to all the preceding information, we call your attention to your rights under art. 7 of the Code for the Protection of Personal Information, which we refer to, among which we mention, the right to:

- a. obtain the indication of the origin of the data, the purposes and methods of treatment, the identification of the owner and those responsible for the processing information, and the subjects or categories of persons to whom the data may be communicated or that may have knowledge of it as managers or those charged with its processing;
- b. obtain the confirmation of the existence of personal information regarding yourself, and the logic applied in the processing performed with the help of electronic instruments;
- c. obtain a cancellation, as well as the transformation in an anonymous form, or block of any data treated in violation of the law;

- d. obtain an update, the rectification – or rather, if required – the integration of said personal data;
- e. obtain the acknowledgment that the operations referred to in (c) and (d) were brought to the attention of those to whom the data were transmitted or disseminated, except in cases prescribed by law;
- f. oppose, for legitimate reasons, the processing of your personal information, even if it is relevant to the purpose of its collection.

To exercise these rights, and in case you encounter problems, or have any requests for clarification of what is written herein, please write to: Hotel Villa Orchidea -38069 Torbole (TN – Italy) - Via Strada Granda n. 7.

## THE "OWNER" OF THE TREATMENT

Following the consultation on the part of the user, the relative information of the identified or identifiable person may be used. "Owner" of the treatment of personal information eventually treated following the consultation of our Site, and of every other information used for the provision of our Services, is Hotel Villa Orchidea, in the person of the legal representative pro tempore. The manager of the treatment of information is Mrs. ELISA SETTI. She may be contacted at:

[info@villaorchidea.com](mailto:info@villaorchidea.com)

## MODIFICATIONS TO THE POLICY

This privacy policy governs the arrangements for the treatment of personal information supplied by the users/visitors during the navigation of the Site. The possible entry into force of new industry standards, as well as the constant review and updating of Services to the user, might result in the need to vary these rules. We therefore invite you to consult this page periodically to review the introduction of any changes.

## APPLICABLE LAW AND JURISDICTION

For any eventual dispute that may arise between the user and the Owner of the processing, or other subjects who have collaborated, collaborate or will collaborate with Hotel Villa Orchidea, the user accepts the jurisdiction of the Italian state, and, in every case, the application of Italian law independently of actual residence or headquarters. The place of jurisdiction is Rovereto (TN - Italy)