

## **INFORMATION REGARDING PERSONAL DATA PROCESSING EU GDPR 16/679 “General Data Protection Regulation”**

Dear Client,

In accordance with the provisions of article 13 of the EU GDPR 2016/679 “General Data Protection Regulation” (hereafter GDPR), the “Centro Turistico Ricettivo Pieve a Salti Srl” (hereafter “C.T.R. Pieve a Salti Srl” or “Owner”), in the capacity of the “Data Controller” with this document shall inform you of the purposes and modalities of the processing of your personal data. Pursuant to the aforementioned regulation, this processing will be based on the principles of lawfulness, equality, transparency, purpose limitation, data minimization, accuracy, limitation of retention, integrity, and confidentiality. The processing of personal data refers to any operation or set of operations performed with or without the aid of automated processes and applied to personal data or set of personal data, such as the gathering, registration, organization, structuring, storage, adjustment or modification, extraction, consultation, use, notification by transmission, diffusion or any other form of provision, comparison or interconnection, limitation, deletion, or destruction.

### **1. Purpose, legal basis and data retention period**

Your personal data will be processed by the C.T.R. Pieve a Salti Srl for the following purposes:

1. To acquire and confirm your booking at our structure and to fulfil the requested food services: being that the processing is necessary for precontractual negotiations and for the fulfilment of a contract of which you are a part and for any subsequent implementations, your consent will not be required (art. 6, par. 1, letter b of the GDPR). Should you refuse to provide data, we will not be able to confirm your booking or fulfil the requested services. The processing will cease at the end of the service, but some of your personal data may or must continue to be processed for the purposes of and with the modalities indicated in the following points.
2. For personalization of food services in view of your special needs or those of third parties (food intolerance, allergies, religious faith, ...): for this purpose your consent is necessary and the processing will cease at the end of the service. Should consent to provide personal data not be given, we will not be able to personalize the food service in view of your special needs.
3. To fulfil obligations required by law, regulations, or European norms (e.g. accounting and fiscal obligations, administrative assessments) as well as by regulations issued by authorities or authorized agencies: given that the processing is necessary to fulfil a legal obligation to which the Owner is subject, your consent is not required (art. 6, par. 1, letter c of the GDPR). The provision of the data is necessary. Should it be refused, we will not be able to provide you with food service. The acquired data for this purpose will be stored by us for the legal data retention period (10 years from the date of the last registration art. 2220 C.C. and for longer in case of tax purposes).
4. For potential credit claims as well as for assessments, the exercise and the defense of the Owner’s or third parties’ rights in judicial and non-judicial proceedings, for insurance purposes: for such processing, your consent is not required as it serves the Owner’s legitimate interest to protect their own rights in the appropriate forums (art. 6, par. 1, letter f of the GDPR). Should it be refused, we will not be able to provide the food service. The acquired personal data for this purpose will be stored until the legally required data retention period ends.

Your personal data will be acquired directly from you. The processing will involve the following categories of personal data:

- identification: general information and contact details, ID number and/or tax identification number, debit or credit card details, list of services and products requested or purchased, ...

- special categories of personal data (data relating to health or religious faith) for the personalization of food services as per art. 9 of the GDPR;
- for the exclusive purpose of achieving the aforementioned objectives by the C.T.R. Azienda Agricola Pieve a Salti Srl.

## **2. Potential recipients or potential categories of recipients of personal data**

The data processing will be carried out by the C.T.R. Pieve a Salti Srl through the use of suitable technical and organizational measures in order to guarantee the integrity, confidentiality and accessibility of your data. The personnel in charge of this area will use hard copies and electronic, computer and telematic means. The management of the C.R.T. Pieve a Salti Srl and its staff, in compliance with the principle of necessity and as persons in charge of the processing, may have knowledge of your personal identification, and, only when strictly necessary, also “special” data. These personnel have been furnished with specific instructions, and they have been given the obligation to keep your data confidential.

Your personal identification data may be transmitted, according to law, to:

- banking institutions and asset management companies with credit cards for the management of payments;
- financial administrators and other enterprises or public entities in compliance with legal obligations;
- companies, fiscal and legal offices for accounting purposes and for the protection of contractual rights, to the extent necessary to carry out their tasks and subject to suitable safeguarding which binds them to the duties of confidentiality and security;
- insurance companies in the case of an accident which involves the Data Subject, to the extent necessary to perform their duties and subject to suitable safeguarding that binds them to the obligation of confidentiality and security
- suppliers, professionals and/or companies of the C.T.R. Pieve a Salti Srl (e.g. computer maintenance and management systems, management and organizational consultancy, ...) to the extent necessary in order to perform their duties and subject to suitable safeguarding that binds them to the obligation of confidentiality and security.

In any case, your personal data will not be subject to disclosure.

## **3. Transfer of your personal data to a third country or to an international organization**

Your personal data will be processed at the registered office of the C.T.R. Azienda Agricola Pieve a Salti Srl and will not be transferred to a country which does not belong to the European Economic Area (EEA) or an international organization.

## **4. Automated decision-making process and proliferation**

Your personal data will not be subject to automated decision-making.

## **5. Rights of Data Subject**

You are entitled, at any time, to exercise the following rights:

- a) pursuant to articles 15, 16, 17, 18, 20, 21, and 22 of the GDPR, you have the right to ask the Owner for access to your personal data and to the correction or cancellation of the same or the limitation of the processing to which it is subject or to oppose the processing, in addition to the right to the transferability of the data;
- b) pursuant to article 7, comma 3 of the GDPR, you are at liberty at any time to withdraw your consent without affecting the legality of the processing based on the consent granted before the withdrawal.

Exercising your rights is not subject to any restrictions. It is sufficient to send a clear notification to the address indicated at the end of this document (“Identity and Contact Details of the Controller”). We inform you that the a procedure is in place at C.T.R. Pieve a Salti Srl to manage the concerns of the Data Subjects.

## **6. The right to file a complaint**

Pursuant to Article 77 of the GDPR, we inform you, as the Data Subject, that should you believe the processing of your data violates the GDPR, you have the right to file a complaint with the Data Protection Supervisor, following the procedure and directions published on the official website of the Supervisor ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

## **7. Identity and contact details of the Controller**

The data controller pursuant to articles 4, n.7, and 24 of the GDPR is the Centro Turistico Ricettivo Pieve a Salti Srl with registered office at Località Pieve a Salti, 105/A – 53024 Montalcino (Si) whose contact details are:

- Telephone: +39 0577 807244
- Fax: +39 0577 809507
- E-mail address: [info@pieveasalti.it](mailto:info@pieveasalti.it)

#### **Update**

**Amendment to GDPR EU 2016/679**

**DECLARATION FOR THE PROCESSING OF PERSONAL DATA (GDPR EU 2016/679)**

I, the undersigned, [full name]  
born in [place] on the [date]

#### **HEREBY DECLARE**

-that I have received the Protection of Personal Data Policy for the processing of my personal data for the purpose of the Centro Turistico Ricettivo Pieve a Salti Srl food services;  
- that I have been informed in writing and that I am aware of that fact that the procedures of the personal data processing for the purposes of the management of the pre-contract negotiations and the fulfilment of the contract of which I am part, to fulfil a legal obligation and to pursue a legitimate interest does not require my explicit consent pursuant to article 6, paragraph 1, letters b), c), and f) of the EU GDPR 2016/679;  
-that I have been informed in writing about the purposes and modalities for the processing of my personal data in order to personalize food services in view of my personal needs;  
-that I have been informed in writing of my due rights pursuant to articles 7, 15, 16, 17, 18, 20, 21, 22, and 77 of the EU GDPR 2016/679.

#### **AND THEREFORE:**

I give my consent            I do not give my consent  
to the treatment of “special” personal data (related to my state of health, religious faith) in order to possibly personalize food services in view of my special needs.

**Date**

**Signature of Declarant**