

## PRIVACY POLICY WEBSITE

### Information notice pursuant to art. 13 Regulation (EU) 2016/679 (GDPR)



#### WHY THESE INFORMATION

Pursuant to Regulation (EU) 2016/679 ("GDPR"), this page describes how personal data are processed. This information notice is provided pursuant to art. 13 GDPR and is not valid for other websites of third parties, which may be consulted through links on the present website. The Data Controller is not responsible for the websites of third parties.

In particular, in the area "Wine" of this website there are links to the website of "Cantina Vallepicciola", that will provide its privacy policy. There is no transfer of data.

#### Processable personal data

**Personal Data:** any information relating to an identified or identifiable natural person ("**data subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference 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 (Recital 26, 27, 30 GDPR).

#### Data relating to Contracting parties/Users

##### Navigation data

Computer systems and software procedures used to the operation of this website acquire, during their normal operation, some personal data whose transmission is implicit in the internet communication protocols. This information is not collected to be associated with identified data subject, but by their nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of computers used by users who connect to the site, URI (Uniform Resource Identifier) of requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, error, etc..) and other parameters regarding the operating system and computer environment. 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 deleted immediately after processing. The data will be used to foresee liabilities in case of computer criminal offences against this site.

##### Personal data provided by data subjects

The optional, explicit and voluntary sending of messages to the contact addresses indicated on this site and/or the filling in data collection forms and/or the provision of personal data during exhibition and events results in the acquisition of the sender's address, necessary to reply to requests, as well as any other personal data provided.

##### Information on the processing of personal data by way of the social media platforms

As for the processing of personal data that is carried out by the social media platforms used by the Data Controller, please consider the information provided by those platforms through their privacy policies. The Data Controller processes the personal data provided by users through the social media pages in order to handle user interactions (comments, public posts, etc) in full compliance with the applicable legislation.

##### Specific information notices

Specific information notices may be present on the pages of this site in relation to particular services or processing of personal data provided.

#### What cookies are



Cookies are small text files containing information generated by a web site's server and placed on a user's-visitor's personal computer, where they are stored and then retransmitted to during the next visit. "Third parties" cookies are instead set by a website other than the one the user is visiting. This happens because on each site there may be elements (images, maps, sounds, specific links to web pages of other domains, etc.) that reside on different hosting-servers. Cookies are employed for different purposes: execution of computer authentication, sessions' monitoring, storage of information relating to specific configurations from users accessing the platform, preferences' storage, etc. Hereunder you will find all the information about cookies installed by this site, and the necessary information on how to manage your preferences.

For more information relating to cookies and their general functions, you can visit an informative website such as [www.allaboutcookies.org](http://www.allaboutcookies.org)

## Cookies





For more information on the cookies used by this website see the cookies policy at the following [link](#)







### 1. DATA CONTROLLER AND CONTACT DETAILS

The Data Controller is **HOTEL LE FONTANELLE SRL**, with registered office in Via Roma no. 11 -- 53017 Radda in Chianti (SI), Italy, in person of its Legal Representative, email [privacy@fontanelleestate.com](mailto:privacy@fontanelleestate.com).

### 2. PURPOSES OF THE PROCESSING | LEGAL BASIS OF THE PROCESSING | DATA RETENTION | NATURE OF PROVISION OF PERSONAL DATA

 PURPOSE OF PROCESSING	 LEGAL GROUND	 DATA RETENTION	 NATURE OF PROVISION
<p><b>i) Website browsing.</b> The browsing data will be processed also for the following purposes:</p> <ul style="list-style-type: none"><li>• statistical information on the use of the services (most visited pages, number of visitors and time range, origin, etc.);</li><li>• check of the correct functioning of the services.</li></ul> <p>The data will be used to foresee liabilities in case of computer criminal offences against this site.</p>	<p>Data processing is necessary for the purposes of pursuing the legitimate interests of the data controller or a third party, provided that the interests or the fundamental rights and freedoms of the data subject which require the protection of personal data do not prevail, having regard to the reasonable expectations of the data subject based on his/her relationship with the data controller. Activities strictly necessary for the operation of the site and the provision of the navigation services. (Art. 6, par. 1 lett. F and Recital 47 of the GDPR). Balancing test available upon request.</p>	<p>Until the duration of the browsing session and, in any case, no longer than seven days (except where judicial authorities need such data for establishing the commission of criminal offences).</p>	<p>The provision of data data is necessary for the browsing on this website.</p>
<p><b>ii) Analysis of navigation by means of Cookies and other technologies other than technical</b></p>	<p>For non-technical cookies and similar technologies, the processing is based on consent (art. 6 par. 1 lett. A and Recital 42, 43 of the GDPR). Consent is expressed through the banner and the cookie policy of this website</p>	<p>More information available in the cookie policy in the footer</p>	<p>More information available in the cookie policy in the footer</p>

Your personal data will also be processed for the following purposes:

 <b>PURPOSE OF PROCESSING</b>	 <b>LEGAL GROUND</b>	 <b>DATA RETENTION</b>	 <b>NATURE OF PROVISION</b>
<p><b>A) Contact and information requests</b> through contact details / collection form on this website: collect and fulfill any user requests</p>	<p>Processing is necessary for the <b>performance of a contract</b> 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 (Recital 44) - <b>art. 6 par. 1 lett. b) of the GDPR.</b></p>	<p>1 year</p>	<p>The communication of the data is <b>necessary</b> for the contract. The non provision of personal data may result the impossibility to obtain from the Data Controller the requested information</p>
<p><b>B) Exhibitions and event</b> attended by the Data Controller: sending a welcome communication after you have expressed interest in our services and fulfill your request of information using the contact details you have provided to the Data controller during the exhibition / event</p>	<p>Processing is necessary for the <b>performance of a contract</b> 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 (Recital 44) - <b>art. 6 par. 1 lett. b) of the GDPR.</b></p>	<p>5 years</p>	<p>The communication of the data is <b>necessary</b> for the contract. The non provision of personal data may result the impossibility to obtain from the Data Controller the requested information</p>
<p><b>C) Direct marketing:</b> upon consent and until withdrawal, for direct marketing and promotional purposes, commercial and marketing communications through subscription to the newsletter/ mailing list service.</p>	<p><b>Consent (Art. 6, par. no. 1 lett. a GDPR).</b></p>	<p>Until withdrawal of consent (opt-out)</p>	<p>Personal data provision is <b>optional</b>. The non-provision of personal data may result the impossibility to process your data for the present purpose, without prejudice for the other purposes.</p>
<p><b>D) Management of your requests</b> pursuant to art. 15 and seq. GDPR (data subject's rights)</p>	<p>The processing is necessary for <b>compliance with a legal obligation</b>, to which the Data Controller is subject to (Recital 45) - <b>Art. 6 par. 1 lett. C of the GDPR).</b></p>	<p>5 years from the closure of the request, except disputes</p>	<p>The communication of personal data is <b>necessary</b>, because essential for the present legal Obligations. The non provision of personal data may result the impossibility to</p>

			obtain from the Data Controller the requested information.
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### 3. RECIPIENTS OR CATEGORIES OF RECIPIENTS

Your personal data will be communicated to subjects who will process the data as Data Processor (art. 28 GDPR) and/or as individuals acting under the authority of the Data Controller and Data Processor (art. 29 GDPR), for the purposes listed above. In particular, the data may be communicated to recipients belonging to the following categories:

- Subjects -based in Italy- that provide services for the website and communication networks, including e-mail, and website management.
- providers of hosting services (based in Germany)
- freelancers, firms or companies providing assistance and advice;
- Competent authorities for compliance with legal obligations and/or provisions of public bodies, upon request.

The list of Data Processors is constantly updated and available by writing to [privacy@fontanellestato.com](mailto:privacy@fontanellestato.com) or at the registered office of the Data Controller.



### 4. DATA TRANSFER TO THIRD COUNTRIES AND/OR INTERNATIONAL ORGANIZATION

Personal data provided will not be transferred outside the European Economic Area (EEA). In particular, data will be stored in Italy for the management, development and maintenance of this website, while the hosting is in Germany.



### 5. EXISTENCE OF AUTOMATED PROCESS

Personal data will be processed by electronic and automated means, but the Data Controller does not use decision-making processes based on a fully automatic elaboration.



### 6. DATA SUBJECT'S RIGHTS

You may exercise your rights as expressed in articles 15 seq. of the GDPR, by contacting the Data Controller at the email address [privacy@fontanellestato.com](mailto:privacy@fontanellestato.com). You have the right, at any time, to request the data Controller to access (art. 15), rectify (art. 16), cancel your personal data (art. 17) or limit their processing (art. 18). The controller shall communicate (art. 19) any rectification or erasure of personal data or restriction of processing carried out to each recipient to whom the personal data have been disclosed. The controller shall inform the data subject about those recipients if the data subject requests it. In the cases provided for, you have the right to the portability of your data (art. 20) and in this case the Data Controller will provide you with a structured, commonly used, and readable form of your personal data electronically. In addition, you have the right to object (art. 21), at any time, to the processing of your data. You have the right to withdrawal your consent without affecting the lawfulness of the processing based on the consent before withdrawal. To stop receiving automated direct marketing communications (e.g. e-mail, newsletter) you can send an e-mail at any time to [privacy@fontanellestato.com](mailto:privacy@fontanellestato.com) with the subject "cancellation from automated" or use our automatic cancellation systems provided for e-mails only. Without prejudice to any other administrative and judicial remedy, if you believe that the processing of data concerning you violates the provisions of the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority ([https://www.garanteprivacy.it/web/guest/home\\_en](https://www.garanteprivacy.it/web/guest/home_en)).



### 8. CHANGES OF THE PRIVACY POLICY

The Data Controller reserves the right to modify, update, add or remove portions of the current Privacy Policy at his discretion and at any time. For this reason, this privacy policy contains an indication of the last update.

Last update: March 21, 2023