



Information on the protection of personal data

The following information provides an overview on the processing of data and on the rights of the interested party following the legal obligation REG CE 679/2016 (GDPR) and the D.Lgs. 196/2003 (Privacy Law)

1. HOLDER OF THE DATA

Who is responsible for the processing of data and how to contact them?

The Holder of the Personal Data is the following company and can be contacted at the contact details indicated:

AZIENDA VITIVINICOLA COMM. G. B. BURLOTTO di MARINA BURLOTTO (c.f. BRLMRN51P62L758E & p.i. 00475940045) with legal registered head office in Verduno (CN), via Vittorio Emanuele n. 28 Tel. (+39) - Telephone: +39 0172 470122 – Fax: +39 0172470322-Email:ufficio@burlotto.com

2. THE SOURCES OF THE DATA

What are the sources and what data do we use?

We process personal data from the physical person who provides it (the “interested party”) when making reservations, attendance registrations, requests for services and/or information, in the extent that is strictly necessary to carry out the activity in the farmhouse run by the Wine producing Company Comm. G.B. Burlotto di Marina Burlotto under the name of “Locanda dell’Orso Bevitore” (from now on referred to also as “The Farmhouse”) in compliance with the legal legislation in force.

We also process, where necessary to provide our services and/or products, the personal data that we obtain from freely accessible public sources, (for example: The Chamber of Commerce, association and commercial registers, the Registry Office, press and Internet) or data that is legally transferred by third parties as a result of any reservations made through websites (Booking.com, Trivago.com, etc..) from companies that are specialized in booking services.

The relevant data are personal information (for example; name, address and other contact details, date and place of birth, nationality) identification data (for example; data on an identity document) and contact details (for example; email, phone number).

Furthermore, we also deal with data concerning state of health (for example; disability, food intolerance, health problems that can affect providing our services in the Farmhouse) that the interested party freely decides to give in order to improve the services at the Farmhouse and to fill any contractual obligations, marketing data and sales and other similar data for the aforementioned categories.

We also process, in compliance with the Privacy Law n.99 of 29th April 2010 & s.m.e I, the data obtained from video surveillance on the premises and communal areas of the Farmhouse carried out for the safety of the property and guests. The presence of the video cameras for surveillance is indicated by special signs positioned within the range of recording of the camera and in compliance with the Privacy Law.

3. PURPOSE OF THE PROCESSING:

Why is your personal data kept (the purpose of data processing) and on which legal basis?

We keep your personal data following the general Rules and Regulations of Europe on data protection (GDPR) and the National Legislation for the following reasons:

Ø **To satisfy contractual obligations:** The data will be processed in order to access the services provided by the recording of reservations, for the initial requirements for the stipulation of the contract, in order to carry out the contract both in the nature of operations and management, including sending of emails (law number. 6 cpv. 1b GDPR)

Specific data provided by the interested party on his/her health, (for example; disability, food intolerance, health problems that can affect providing our services in the Farmhouse) can be required only when strictly necessary for the purpose of improving the service at the Farmhouse **and can be used by the Holder only following the specific consent of the interested party.**

- **To fulfil legal obligations or in the public interest:** The data will be processed for administration and accounting needs following legal obligations, in particular for tax purposes, including sending commercial invoices by email; (law number. 6 cpv. 1c e 1e GDPR)
- **In consideration of assessment of interests:** over and above the fulfilling of contract, for the purpose of pursuing legitimate interests on our part or on those of a third party, for example (and not a complete list):
 - Valuation of legal claims and in defence in legal disputes
 - Video surveillance for protection of property by the owner of the premises, the security of areas and to restrict access by persons non authorised, as authorised by the DLT in Cuneo;
 - Measures for the construction and security of websites (for example: to control access); and nevertheless, after weighing up the legitimate interest of the Holder or the third party and the rights and liberty of the interested party (law number. 6 cpv. 1f GDPR).
- **For the purpose of marketing, but only after receiving consent**

Data can be used by the Holder for the purpose of marketing, commercial information and promotional activities including sending newsletters and publicity material, also through messaging applications, only following specific consent from the interested party, without influencing the right of withdrawal at any time. The withdrawal of consent will not affect the lawfulness of the data processing prior to the withdrawal. (law number. 6 cpv. 1a GDPR)

4. RECEIVERS OF THE DATA

Who receives and processes the data?

Within our company each designated person (for example; reception-registration, admin office, accounting and commercial office) will have access to the data, to the minimum extent necessary, in order to comply with our contractual and legal obligations.

Regarding the transfer of data outside of our company, we can transmit data only following legislation from Public Bodies and Public Administration, and to the appointed data processors who deal on behalf of the Data Holder, the credit institutions, personnel specialised in the management of information systems and/or payment systems, personnel specialised in credit recovery and/or that

provide the goods and services offered by the Data Holder, personnel who carry out transport or postal activity and also personnel that the Data Holder uses to carry out promotional activities, publicity, marketing and communication, professional studies and consulting, to personnel designated to keep accounts or the auditing of the company financial statements.

5. TRANSFER OF DATA ABROAD

Will data be transferred to another country abroad or to an international organisation?

The transfer of data to individuals or organisations outside of Italy or the European Union may take place if necessary for the conclusion and/or to fulfil a contract or to fulfil legal requirements (for example; the legal obligations concerning tax laws) or in the case of specific consent. The specific information about guarantee measures adopted in relation to the transfer of data can be requested from the Holder of the Data. (law number.13 cpv 1F GDPR).

6. DATA PROCESSING AND STORAGE PERIOD

How the personal data is processed and for how long is it stored?

The processing of personal data will be in either paper and/or electronic form, computer and optics, following the security procedures stated in the law number 32 of GDPR and the National Legislation, by persons expressly appointed and suitably trained to operate in the compliance of the legislation number. 29 GDPR.

The video surveillance data will be processed following the procedure of the Privacy Law n.99 of 29th April 2010 and s.m.i, and will be retained for a maximum of 24 hours, possibly extendable only for public security needs and only following the request of the authorities.

We process data in compliance of the law, limited to the purpose and time needed to fulfil our contractual obligations. Following the conclusion of the contract, the data can be conserved only for the time necessary to fulfil legal obligations, for example, tax purposes and anti-money laundering (10 years) When data is kept by us exclusively for marketing reasons and/or for the sending of newsletters, it will be kept for a maximum of 24 months.

7. RIGHTS OF THE INTERESTED PARTY

What are your rights?

The interested party has the right to request the Holder, at the contact address indicated, **access to his/her processed data** in compliance with the law 15 GDPR, **the correction and updating of data** in compliance with the law 16 GDPR, **the cancellation of data** in compliance with the law 17 GDPR (right to be removed), **the limitation of data processing** in compliance with the law 18 GDPR. The interested party also has the right to **request data transfer** following the law 20 GDPR; **may exercise the right to object to the processing** following the legislation in law.21 par.1 GDPR and the **right to lodge a complaint** with the supervising authority (The Data Protection Authority) (law number.77 GDPR).

The interested party can also revoke consent to data processing at any moment. This also applies to the withdrawal of consent carried out before the GDPR entered into force. In this case the withdrawal will take effect only for the future and will not have any effect concerning the processing of data made before the withdrawal.

8. OBLIGATION TO PROVIDE DATA

Are you obliged to provide data?

The interested party is obliged to provide the requested personal data for the purpose of executing contractual obligations, as well as data that we will be required to collect to comply with legal obligations. In the absence of such data we will not be able to fulfil the contract.

9. AUTOMATED DECISION-MAKING PROCESSES - PROFILING

To what extent is there an automated decision process or data profiling?

We do not use any automated decision process, including profiling, in compliance with the law number 22 GDPR. Should we use these procedures in single cases, it will be our duty to communicate this following the necessary legal requirements.

Information on the right to revoke consent following the law number.21 of the GDPR

A) The right to revoke consent to the processing of data for the purpose of marketing

In the case of consent to data processing for the purpose of marketing, the interested party has the right to revoke the processing of said data related to this type of marketing activity at any time. In the case of opposing to data processing for the purpose of marketing we will no longer process personal data for this purpose.

The right to object by the interested party

For any particular reasons related to the interested party, the said party has the right to object in any moment to the processing of personal data following the law number. 6, cpv. 1, letter E of the GDPR (treatment of data in the public interest) and through the legislation cpv. 1, letter F of the GDPR (treatment of data on the basis of evaluation of interest).

The objection does not need to be made in a specific form and must be addressed to the Holder of the Data indicated at the beginning of this document. In the case of objection we will no longer process personal data from the interested party, except in the case of mandatory legal obligations necessary to fulfil the request, rights and freedoms or for use to carry out, check and defend a right in court. We inform you that in such cases we may no longer be able to fulfil the contract and provide the service.