



## **PRIVACY POLICY**

### **Privacy Policy Pursuant to Article 13, GDPR**

Pursuant to article 13 of the GDPR (EU regulation 2016/679), the following information is provided, in accordance with the principle of transparency, in order to make the data subject aware of how we collect, use, share, store and transfer the data of users and/or visitors of the website WWW.CAVALLINO-BIANCO.COM, collected through the Site itself.

#### **a. Identity and contact details**

The Data Controller is the Company Cavallino Bianco Family S.p.A. Grand Hotel (Tax Code 00633280219), with registered office at 39046 Ortisei- Val Gardena (BZ), Via Rezia, 22, tel. +39 0471783333, email [info@cavallino-bianco.com](mailto:info@cavallino-bianco.com) (hereinafter the "**Data Controller**").

If you have any questions regarding our use of your personal data or relating to this policy, you can contact the Privacy Coordinator as follows: email [ralph@cavallino-bianco.com](mailto:ralph@cavallino-bianco.com), tel +39 0471783191.

#### **b. Information collected automatically by the Site – Cookies**

The Site uses log files, in which information collected automatically during your visits is stored. The information technology systems and software procedures used by the Site during the course of its normal operation automatically acquire information whose transmission is implicit in the use of Internet communication protocols.

The information collected may, by way of example, be the following:

- (I) Internet Protocol (IP) address or the domain name of the device you are using;
- (II) Type of browser and device settings used to connect to the Site;
- (III) The addresses in URI (Uniform Resource Identifier) notation of the requested resources or the method used in submitting the request to the server;



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- (IV) Name of the Internet Service Provider (ISP);
- (V) Date and time of the visit;
- (VI) Web page of origin (referral) and exit of the User;
- (VII) Number of clicks, where applicable;
- (VIII) The size of the file obtained in response.

Such information is processed automatically and collected in aggregated form in order to verify the proper functioning of the Site.

In addition, cookies are used on the Site. Cookies are text files recorded on a computer medium, which allow for the recording of some parameters and data communicated to the computer system, through the browser you are using. These tools therefore allow an analysis of your habits in the use of the Site, for different purposes: execution of computer authentication, monitoring of sessions, storage of information on specific configurations regarding users accessing the server, storage of preferences, etc.

Cookies are distinguished as follows:

- (I) Technical cookies: these technologies are necessary to activate the main features of the Site;
- (II) Functional cookies: these technologies allow the analysis of the use of the Site in order to measure and improve its performance;
- (III) Marketing Cookies: these technologies are used by advertisers to post ads that are relevant to your interests.

Your consent is not required for the installation of Technical Cookies. For the installation of functional and Marketing Cookies, your consent is required: in the event that you do not want your device to receive and store functional and/or Marketing Cookies, you can enable or disable the various marking, analysis and tracking tools used by the site.



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Cookies are not harmful to the visitor's computer, tablet or smartphone. In the cookies generated by the Site WWW.CAVALLINO-BIANCO.COM, no personal identification data is stored, but only encrypted information.

In addition, systems are used to collect information about users such as IP address, type of browser and operating system used and/or web pages visited by a user, for statistical or security purposes.

#### **- Interaction with social media and external platforms**

This type of service allows interactions with social networks, or with other external platforms, directly from the pages of WWW.CAVALLINO-BIANCO.COM and it is possible that, even if Users do not use the service, it collects traffic data relating to the pages on which it is installed. The interactions and information acquired are in any case subject to the User's privacy settings relating to each social network.

The following third-party services and content are identified:

(I) Google Analytics, Google-IP-Locator, Google Maps, Google Maps Distance API, Google reCAPTCHA Owner: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

(II) YouTube Content

Owner: Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA

(III) Social Network: Facebook

Owner: Facebook Inc., Menlo Park, California, USA

(IV) Social Network: Google Plus

Owner: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

(V) Social Network: Instagram

Owner: Facebook Inc., Menlo Park, California, USA



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(VI) Social Network: Twitter

Owner: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2  
D02 AX07,

Ireland

(VII) Vimeo

Owner: Vimeo Inc., 555 West 18th Street, New York, New York 10011

(VIII) Hotjar

Owner: Hotjar Ltd, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's  
STJ 1000, Malta

It should be noted that the list is purely illustrative and Cavallino Bianco Family S.p.A. reserves the right to upload further external content via widgets and iframes. To access this list of external content, it is necessary to send an email to [ralph@cavallino-bianco.com](mailto:ralph@cavallino-bianco.com).

#### **c. Purpose and legal basis of processing**

We need your data to allow you to proceed with the subscriptions/registrations and access the services offered therein (e.g. online booking, newsletters, contacts, etc.) as requested by you.

The Data Controller will collect and process only personal data voluntarily provided by the user of the Site. Therefore, visitors are able to access the Site and browse it even without revealing personal information and data.

Cavallino Bianco Family S.p.a. Grand Hotel does not deliberately collect, through the website, sensitive or judicial data.

Sensitive Data, pursuant to article 4 of the European Regulation GDPR 679/2016, includes personal data capable of revealing racial and ethnic origin, religious,



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philosophical or other beliefs, political opinions, membership of parties, unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as personal data capable of revealing the state of health and sexual life. Judicial data, also pursuant to article 4 of the European Regulation GDPR 679/2016, include personal data suitable for revealing measures referred to in article 3, paragraph 1, letters a) to o) and r) to u), of Italian Presidential Decree no. 313 of 14 November 2002, regarding the criminal record, the registry of administrative sanctions dependent on the crime and the related pending charges, or the quality of defendant or suspect pursuant to articles 60 and 61 of the Code of Criminal Procedure. We recommend that you do not provide such information through our site. In the event that this is necessary (for example, in the case of belonging to protected categories, in the case of sending curricula vitae for recruitment purposes, in response to a job announcement or in the case of an expression of interest in working with us) we invite you to send us a registered letter with the expression of your consent in writing to the processing of this information.

Each Site Visitor may choose to provide Cavallino Bianco Family S.p.a. Grand Hotel with limited personal data as required in order to access certain services.

Once registered, the personal data collected will be processed for the following purposes:

- **Fulfilment of a legal obligation**

The Data Controller may carry out the processing of your Data if this is necessary in relation to the fulfilment of legal obligations relating to them. If necessary, the processing will be based on the condition of lawfulness referred to in Article 6, paragraph 1, letter c), GDPR.

- **Contact request**

The Data Controller may send communications to Users interested in receiving information about the products, services, offers, events/courses offered by the Data Controller and in planning their holiday at the hotel, and may also request quotes or



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information on availability for stays. The personal data required to access this service are exclusively the following: first name, surname, email address, telephone number.

The processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR)

#### **- Execution of statistical analyses**

The Data Controller may process your personal data in the performance of market analysis and/or analyses related to its services.

Any processing shall be carried out on the basis of the legitimate interest of the Data Controller to improve its services, pursuant to Article 6, paragraph 1, letter f), GDPR. To this end, the information is generally stored in an anonymised form and processed in an aggregated format. Usually, such activities do not involve the processing of Data, understood as information attributable to you as an identifiable subject. On the contrary, appropriate security measures will be implemented (such as, by way of example, pseudonymisation).

#### **- Sending customer satisfaction communications**

The Data Controller may send you communications by email or contact you by telephone with an operator to understand your opinion about a particular service you have received, in order to improve its services in the future and, in particular, the customer experience.

In this case, your Data will be processed on the basis of the legitimate interest of the Data Controller, in compliance with the principles referred to in Article 6, paragraph 1, letter f), GDPR.

In this regard, pursuant to Article 21, paragraph 1 of the GDPR, you may at any time and free of charge exercise the right to object to the receipt of further communications, by



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means of the specific link provided at the bottom of each of the customer satisfaction emails that you may receive. The provision of personal data for the purpose of carrying out customer satisfaction surveys is not, in fact, mandatory and is not a necessary requirement for the conclusion of the hotel and/or catering contract.

**- Management of User registration and/or access to any reserved areas available on the site**

**A. Establishment and management of the contractual relationship**

The Data Controller will process the Data in order to follow up on your requests and, specifically, in the context of the necessary, functional activities related to the establishment and subsequent administration of the contractual relationship, including the creation of your personal data system, the provision of the service you want to use, the sending of invoices, the collection of the sums due, technical assistance or customer care activities in general, etc.

The Data Controller, to achieve these purposes, processes your Data on the basis of the condition of lawfulness referred to in Article 6, paragraph 1, letter b), GDPR, since the processing is necessary for the execution of a contract to which you are a party or for the execution of pre-contractual measures adopted at your request.

**B. Reservation request**

Through this service, the User has the opportunity to request information about offers, availability for stays/holidays, as well as to make reservations or purchases of holidays/stays and other services offered by Cavallino Bianco Family S.p.A. Grand Hotel, such as, for example, those attributable to the wellness areas, Linoland, dedicated events, etc. The User also has the opportunity to register for the events proposed by the hotel.



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The Data Controller, to achieve these purposes, processes your Data on the basis of the condition of lawfulness referred to in Article 6, paragraph 1, letter b), GDPR, since the processing is necessary for the execution of a contract to which you are a party or for the execution of pre-contractual measures adopted at your request.

It is specified that sensitive data may also be required for the aforementioned purposes. Sensitive data are those data capable of revealing religious, philosophical or other beliefs, as well as personal data capable of revealing the state of health (specifically any allergies or intolerances, vegan or vegetarian diet or linked to religious beliefs, etc.).

These data shall be processed exclusively for the purpose for which they were requested and will not be communicated to other subjects, nor will they be disseminated.

For the processing of the data in question, explicit consent is required from the User, pursuant to Article 9, paragraph 1, GDPR. However, we inform you that the provision of these data is mandatory and any refusal to provide such data may result in the failure or partial execution of the contract.

#### **- Jobs**

The "Jobs" section offers the opportunity to express interest in working at our company or to respond to a job announcement for vacant or new positions. If you decide to send your personal data, they will be processed exclusively for these purposes by specially appointed personnel, according to the normal internal personnel management procedures of Cavallino Bianco Family S.p.A. Grand Hotel.

The personal data we collect and store mainly concern two categories:

- (I) Data provided in your candidate profile, including name, surname, nationality, email address and telephone number;
- (II) Data provided in the documents related to your application (curriculum vitae, cover letter), including professional experience, qualifications and language skills.



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These data will be used to evaluate the application, contact you during the recruitment process or for alternative career opportunities in Cavallino Bianco Family S.p.A. Grand Hotel, or in response to spontaneous applications.

The processing of data is necessary for the processing of the application and for the possible establishment of an employment contract at our hotel (Article 6.1, letter b, GDPR). In addition, there is a legitimate interest to respond correctly to requests or communications from the data subjects (Article 6.1, letter f, GDPR).

#### **- Sudtirolo Alto Adige Guest Pass**

##### **▪ Purpose**

The personal data provided will be transmitted to the single coordinating body of the Guest Pass in order to enable the creation and use of the Guest Pass and to provide the associated services.

##### **▪ Recipient**

In connection with the issue of the Guest Pass, your data will be transmitted to the Mobilitätskonsortium, VAT Nr. 02735170215, which acts as the cardholder and unified coordinating body and assumes the role of autonomous data controller in processing the transferred data.

For further information regarding the processing to which the data will be subjected, you can send an email to [privacy@moko.bz.it](mailto:privacy@moko.bz.it).

##### **▪ Legal basis**

The legal basis for processing is Art. 6 (1) (b) of the GDPR.



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- **Promotion, marketing and advertising**

The Data Controller will process the Data to send you the following by email:

- (I) Commercial or promotional communications related to products and/or services;
- (II) Invitations to participate in initiatives or events possibly organised by the Data Controller, also in collaboration with third parties;

In this regard, we would like to inform you that, in order to invite you to take part in initiatives that may be of interest to you, the Data Controllers may take into account your preferences, as shown by your previous reservations and services and, in general, by your relationship with the Data Controller.

This, however, will not have consequences on your rights and freedoms as a data subject, since you will still have the opportunity to access all the products/services offered by the Data Controller and, in addition, there are and will be no restrictions based on the preferences expressed by the data subjects.

The Data Controllers will process your Data in compliance with the principles referred to in the GDPR on the basis of their legitimate interest, as provided for in Article 6, paragraph 1, letter f), GDPR.

In this regard, the provision of personal data for the purpose of carrying out direct marketing is not mandatory and is not a necessary requirement for the conclusion of the hotel and/or catering contract; pursuant to Article 21, paragraphs



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2 and 3 of the GDPR, the data subject has the right to object at any time to the processing carried out for direct marketing, following the instructions at the bottom of each promotional message. Opposition to the processing will have no consequence other than not receiving direct marketing communications.

In addition, if you have given your consent, the Data Controller may process the aforementioned Data to send you commercial and/or promotional communications relating to all the Data Controller's products and services, as well as to invite you to participate in events organised by the Data Controller ("Indirect Marketing").

The processing of your Data for this purpose will be possible only if you have given your consent, constituting the condition of lawfulness. In this regard, we inform you that you have the right to withdraw the previously expressed consent, free of charge and at any time, by means of the link available at the bottom of all the indirect marketing communications you may have received.

Finally, for all the aforementioned purposes, the processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR)

#### **- Purchase of services, products, vouchers**

Through the site, it is possible to buy products available in our range, thus enjoying the convenience and practicality provided by the online purchase method through the site.

The processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR). We inform you that the provision of these data is mandatory and any refusal to provide such data may result in the failure or partial execution of the contract.

#### **- Newsletter**

This section is aimed at Users interested in receiving electronic communications following an express request, by filling in a special contact form. There is no further processing of the data, with respect to the mere sending of the newsletter. The personal



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data required to access this service are exclusively the following: first name, surname, and email address, to be included in the special contact form present in the 'newsletter' section.

We inform you that you have the right to cancel the service you have previously expressly requested, free of charge and at any time, by means of the link available at the bottom of all the emails received.

The processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR)

#### **d. Methods and means of processing**

Personal data are processed by automated tools for the time necessary to achieve the purposes for which they were collected.

Specific technical and organisational security measures are observed to prevent data loss, illicit or incorrect uses and unauthorised access in compliance with the obligations of adaptation to appropriate safety measures. In fact, all the data will be acquired and stored in accordance with Articles 32, 33 and following of the GDPR. Cavallino Bianco Family S.p.A. Grand Hotel adopts security procedures capable of protecting personal data against:

- (I) Unauthorised access;
- (II) Misuse or disclosure;
- (III) Unauthorised modification;
- (IV) Loss or destruction, whether accidental or caused by an unlawful act.

The Data Controller is not responsible for errors, content, cookies, publications of illegal or immoral content, advertising, banners or files that do not comply with the regulatory provisions in force on sites not managed by the same.



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#### **e. Recipients, or any categories of recipients, of personal data**

The data are processed within the Company by subjects authorised to process the data under the responsibility of the Data Controller for the purposes indicated above. Personal data will not be communicated to other companies without your explicit consent.

However, only where strictly necessary, the Data Controller may share personal data with: other Users for reasons related to the services; suppliers of IT services, communication, compliance, assistance and customer management; that of Cavallino Bianco Family S.p.A. Grand Hotel, and business partners for reasons related to the services; suppliers of commercial information; if requested, persons associated with the Users; where required, regulatory authorities, competent courts, law enforcement agencies (including the police), public administrations and, in general, any other Body or Institute for the fulfilment of legal obligations.

These recipients may act as independent data controllers or data processors. The data processors follow the instructions of the Data Controller.

#### **f. Communication and transfer of data to a third country**

With your explicit consent, your personal data may be transferred to external organisations, parties or companies (including consultants and service providers) that the Data Controller uses for the management of the Site and for the performance of activities related, instrumental or consequent to the execution of the services offered by the Site, which may be located in European or non-European countries.

Some of these may not provide adequate data protection guarantees (a complete list of the countries that provide adequate data protection guarantees is available on the website of the Italian Data Protection Authority). In such cases, the Company will ensure that appropriate safeguards are in place to protect your personal data in those countries in accordance with this Privacy Policy. Some of the safeguards that we may adopt, where



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appropriate, include: the use of standard contractual clauses approved by the European Commission with our suppliers, intra-group transfer contracts (so that we can safely transfer your personal data between group companies around the world) and the adequacy of the EU-US Data Privacy Framework (DPF).

#### **g. Links with third-party sites**

Please note that WWW.CAVALLINO-BIANCO.COM may contain links to other sites that are not governed by this privacy policy.

#### **h. Children under the age of 16**

The website of Cavallino Bianco Family S.p.A Grand Hotel governed by this privacy policy is not intended for use by children under the age of 16. We understand the importance of protecting information intended for minors, especially in an online environment, and therefore we do not deliberately collect or maintain personal data relating to minors.

#### **i. Data Retention Period**

The information and personal data will be kept for a period of time not exceeding that necessary to achieve the purposes for which they were collected and processed.

Once the service is completed, all personal data will be destroyed in compliance with Cavallino Bianco Family S.p.A. Grand Hotel's policies on data retention, unless otherwise requested by the authority and except for storage needs established by law, or as indicated in this policy "measures of the use of the Site WWW.CAVALLINO-BIANCO.COM for particular sections of this website, or according to its explicit requests, as outlined below.

For the purposes of Customer Satisfaction and the Newsletter, the data will be kept until



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you have asked not to use them anymore or you request their deletion and, in any case, no later than the duration of the contractual relationship.

The storage time may be extended and involve the acquisition of further data subsequently, in the event that the User himself/herself requests additional services; in this case, the duration of the processing, for administrative, accounting, tax and contractual purposes, may be extended up to 10 years from the termination of the relationship, or, in the event of disputes, for the statutory term provided for by the legislation for the protection of related rights, without prejudice in any case to longer storage periods provided for by specific sector regulations. Transaction data, as well as sensitive data, are kept for up to 2 years if no reservations are made in the last 24 months.

The data provided for pre-contractual purposes will be processed for the time strictly necessary to provide feedback on the requests and communications voluntarily sent by the customer.

The data provided through the sending of the curriculum vitae (CV) will be kept for a maximum period of 1 year from the date of receipt, in order to evaluate the application and be able to contact you as part of the recruitment process. The period could be longer, up to a maximum of 2 years, when the possibility of using and therefore processing the data is mentioned in the training and/or in the vacancy advertisement, also for any positions different from those for which the data subject has applied.

The data processed for the purposes of promotions, marketing, and advertising are kept for a maximum time of 24 months from the date of the release of the marketing consent or from the date of the last interaction with the Data Controller.

The data useful for the execution of statistical analyses will be processed for a maximum period of 24 months from registration, unless the right to oppose the processing is exercised.



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In some circumstances, we may anonymise your personal data so that they can no longer be associated with you; in such cases, we may use said data without further notice to you.

#### **j. Rights on data**

Please note that, regarding your personal data, you can exercise the following rights:

1. Right of access to your personal data: You have the right to obtain confirmation about the existence or otherwise of a processing operation concerning your Data, and, where appropriate, the right to receive any information relating to the same processing operation;
2. Right to obtain rectification: You have the right to obtain the rectification of your Data in our possession, when they are incomplete or inaccurate;
3. Right to deletion: In certain circumstances, you have the right to obtain the deletion of your Data present within our files if it is not relevant for the purposes of the continuation of the contractual relationship or necessary to fulfil a legal obligation to which the Data Controllers are subject or for the assessment, exercise or defence of their right in court;
4. Right to limitation of processing: upon the occurrence of certain conditions, you have the right to obtain the limitation of the processing concerning your Data;
5. Right to portability: upon the occurrence of certain circumstances, you have the right to obtain the transmission of your Data in our possession in favour of a different data controller;
6. Right to oppose the processing: You have the right to oppose, at any time for reasons related to your particular situation, the processing of Data concerning you based on the condition of lawfulness of the legitimate interest or the execution of a task of public interest or the exercise of public powers, including profiling, unless there are



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legitimate reasons for the Data Controller to continue the processing that prevail over the interests, rights and freedoms of the data subject or for the assessment, exercise or defence of a right in court;

7. Right to withdraw consent: You have the right to withdraw your consent to the processing of your Data at any time, without prejudice to the lawfulness of the processing based on the prior consent of the revocation.

With regard to the methods of exercising the aforementioned rights, the data subject may write to the Privacy Coordinator.

#### **j. Complaints**

The data subject is informed that he/she has the right to lodge a complaint with the independent administrative authority competent in the Member State of the European Union where he/she usually resides, where he/she works, or where an alleged violation of the law on the protection of personal data has occurred. In Italy, the data subject may file a complaint with the Data Protection Authority (Tel: 06/69677.3785, website: [www.garanteprivacy.it](http://www.garanteprivacy.it)).

#### **k. Provision of data**

The provision of some data is necessary to allow the Company to fulfil the contractual obligations, such as accounting and tax obligations; any refusal to provide the requested data or the authorisation to process them, will not allow the contractual relationship to be finalised or to be fully and regularly executed, insofar as such data are necessary for its execution.

For other services, on the other hand, the provision of data has no consequence other than not being able to use the service (e.g. marketing, newsletters).



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#### **l. Different purposes of data processing**

It is specified that if the Data Controller intends to further process the personal data for a purpose other than that for which they were collected, before such further processing, the Data Controller will provide the data subject with information about this different purpose and any other relevant information.

#### **m. Profiling**

The Data Controller may use automated processes aimed at profiling.

The Data Controller, [Signature]



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#### a. Identity and contact details

The Data Controller is the Company Cavallino Bianco Caorle Srl (Tax Code IT03122190212), with registered office at 39046 Ortisei- Val Gardena (BZ), Via Rezia, 22, tel. +39 0471783333, email [caorle@cavallino-bianco.com](mailto:caorle@cavallino-bianco.com) (hereinafter the "Data Controller").

If you have any questions regarding our use of your personal data or relating to this policy, you can contact the Privacy Coordinator as follows:

email [ralph@cavallino-bianco.com](mailto:ralph@cavallino-bianco.com), tel +39 0471783191.

#### b. Information collected automatically by the Site – Cookies

The Site uses log files, in which information collected automatically during your visits is stored. The information technology systems and software procedures used by the Site during the course of its normal operation automatically acquire information whose transmission is implicit in the use of Internet communication protocols.

The information collected may, by way of example, be the following:

- (I) Internet Protocol (IP) address or the domain name of the device you are using;
- (II) Type of browser and device settings used to connect to the Site;
- (III) The addresses in URI (Uniform Resource Identifier) notation of the requested resources or the method used in submitting the request to the server;
- (IV) Name of the Internet Service Provider (ISP);
- (V) Date and time of the visit;
- (VI) Web page of origin (referral) and exit of the User;
- (VII) Number of clicks, where applicable;
- (VIII) The size of the file obtained in response.



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Such information is processed automatically and collected in aggregated form in order to verify the proper functioning of the Site.

In addition, cookies are used on the Site. Cookies are text files recorded on a computer medium, which allow for the recording of some parameters and data communicated to the computer system, through the browser you are using. These tools therefore allow an analysis of your habits in the use of the Site, for different purposes: execution of computer authentication, monitoring of sessions, storage of information on specific configurations regarding users accessing the server, storage of preferences, etc.

Cookies are distinguished as follows:

- (I) Technical cookies: these technologies are necessary to activate the main features of the Site;
- (II) Functional cookies: these technologies allow the analysis of the use of the Site in order to measure and improve its performance;
- (III) Marketing Cookies: these technologies are used by advertisers to post ads that are relevant to your interests.

Your consent is not required for the installation of Technical Cookies. For the installation of functional and Marketing Cookies, your consent is required: in the event that you do not want your device to receive and store functional and/or Marketing Cookies, you can enable or disable the various marking, analysis and tracking tools used by the site.

Cookies are not harmful to the visitor's computer, tablet or smartphone. In the cookies generated by the Site [WWW.CAVALLINO-BIANCO.COM](http://WWW.CAVALLINO-BIANCO.COM), no personal identification data is stored, but only encrypted information.

In addition, systems are used to collect information about users such as IP address, type of browser and operating system used and/or web pages visited by a user, for statistical or security purposes.

#### **- Interaction with social media and external platforms**

This type of service allows interactions with social networks, or with other external platforms, directly from the pages of [WWW.CAVALLINO-BIANCO.COM](http://WWW.CAVALLINO-BIANCO.COM) and it is possible that, even if Users do not use the service, it collects traffic data relating to the pages on which it is installed. The interactions and information acquired are in any case subject to the User's privacy settings relating to each social network.



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The following third-party services and content are identified:

(I) Google Analytics, Google-IP-Locator, Google Maps, Google Maps Distance API, Google reCAPTCHA Owner: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

(II) YouTube Content

Owner: Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA

(III) Social Network: Facebook

Owner: Facebook Inc., Menlo Park, California, USA

(IV) Social Network: Google Plus

Owner: Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

(V) Social Network: Instagram

Owner: Facebook Inc., Menlo Park, California, USA

(VI) Social Network: Twitter

Owner: Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2 D02 AX07,

Ireland

(VII) Vimeo

Owner: Vimeo Inc., 555 West 18th Street, New York, New York 10011

(VIII) Hotjar

Owner: Hotjar Ltd, Level 2, St Julian's Business Centre, 3, Elia Zammit Street, St Julian's STJ 1000, Malta

It should be noted that the list is purely illustrative and Cavallino Bianco Caorle Srl reserves the right to upload further external content via widgets and iframes. To access this list of external content, it is necessary to send an email to [ralph@cavallino-bianco.com](mailto:ralph@cavallino-bianco.com).

#### c. Purpose and legal basis of processing

We need your data to allow you to proceed with the subscriptions/registrations and access the services offered therein (e.g. online booking, newsletters, contacts, etc.) as requested by you.



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The Data Controller will collect and process only personal data voluntarily provided by the user of the Site. Therefore, visitors are able to access the Site and browse it even without revealing personal information and data.

Cavallino Bianco Caorle Srl does not deliberately collect, through the website, sensitive or judicial data.

Sensitive Data, pursuant to article 4 of the European Regulation GDPR 679/2016, includes personal data capable of revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as personal data capable of revealing the state of health and sexual life. Judicial data, also pursuant to article 4 of the European Regulation GDPR 679/2016, include personal data suitable for revealing measures referred to in article 3, paragraph 1, letters a) to o) and r) to u), of Italian Presidential Decree no. 313 of 14 November 2002, regarding the criminal record, the registry of administrative sanctions dependent on the crime and the related pending charges, or the quality of defendant or suspect pursuant to articles 60 and 61 of the Code of Criminal Procedure. We recommend that you do not provide such information through our site. In the event that this is necessary (for example, in the case of belonging to protected categories, in the case of sending curricula vitae for recruitment purposes, in response to a job announcement or in the case of an expression of interest in working with us) we invite you to send us a registered letter with the expression of your consent in writing to the processing of this information.

Each Site Visitor may choose to provide Cavallino Bianco Caorle Srl with limited personal data as required in order to access certain services.

Once registered, the personal data collected will be processed for the following purposes:

- **Fulfilment of a legal obligation**

The Data Controller may carry out the processing of your Data if this is necessary in relation to the fulfilment of legal obligations relating to them. If necessary, the processing will be based on the condition of lawfulness referred to in Article 6, paragraph 1, letter c), GDPR.



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#### **- Contact request**

The Data Controller may send communications to Users interested in receiving information about the products, services, offers, events/courses offered by the Data Controller and in planning their holiday at the hotel, and may also request quotes or information on availability for stays. The personal data required to access this service are exclusively the following: first name, surname, email address, telephone number.

The processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR)

#### **- Execution of statistical analyses**

The Data Controller may process your personal data in the performance of market analysis and/or analyses related to its services.

Any processing shall be carried out on the basis of the legitimate interest of the Data Controller to improve its services, pursuant to Article 6, paragraph 1, letter f), GDPR. To this end, the information is generally stored in an anonymised form and processed in an aggregated format. Usually, such activities do not involve the processing of Data, understood as information attributable to you as an identifiable subject. On the contrary, appropriate security measures will be implemented (such as, by way of example, pseudonymisation).

#### **- Sending customer satisfaction communications**

The Data Controller may send you communications by email or contact you by telephone with an operator to understand your opinion about a particular service you have received, in order to improve its services in the future and, in particular, the customer experience.

In this case, your Data will be processed on the basis of the legitimate interest of the Data Controller, in compliance with the principles referred to in Article 6, paragraph 1, letter f), GDPR.

In this regard, pursuant to Article 21, paragraph 1 of the GDPR, you may at any time and free of charge exercise the right to object to the receipt of further communications, by means of the specific link provided at the bottom of each of the customer satisfaction emails that you may receive. The provision of personal data for the purpose of carrying



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out customer satisfaction surveys is not, in fact, mandatory and is not a necessary requirement for the conclusion of the hotel and/or catering contract.

#### **- Management of User registration and/or access to any reserved areas available on the site**

##### **A. Establishment and management of the contractual relationship**

The Data Controller will process the Data in order to follow up on your requests and, specifically, in the context of the necessary, functional activities related to the establishment and subsequent administration of the contractual relationship, including the creation of your personal data system, the provision of the service you want to use, the sending of invoices, the collection of the sums due, technical assistance or customer care activities in general, etc.

The Data Controller, to achieve these purposes, processes your Data on the basis of the condition of lawfulness referred to in Article 6, paragraph 1, letter b), GDPR, since the processing is necessary for the execution of a contract to which you are a party or for the execution of pre-contractual measures adopted at your request.

##### **B. Reservation request**

Through this service, the User has the opportunity to request information about offers, availability for stays/holidays, as well as to make reservations or purchases of holidays/stays and other services offered by Cavallino Bianco Caorle Srl, such as, for example, those attributable to the wellness areas, Linoland, dedicated events, etc. The User also has the opportunity to register for the events proposed by the hotel.

The Data Controller, to achieve these purposes, processes your Data on the basis of the condition of lawfulness referred to in Article 6, paragraph 1, letter b), GDPR, since the processing is necessary for the execution of a contract to which you are a party or for the execution of pre-contractual measures adopted at your request.

It is specified that sensitive data may also be required for the aforementioned purposes. Sensitive data are those data capable of revealing religious, philosophical or other beliefs, as well as personal data capable of revealing the state of health (specifically any allergies or intolerances, vegan or vegetarian diet or linked to religious beliefs, etc.).



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These data shall be processed exclusively for the purpose for which they were requested and will not be communicated to other subjects, nor will they be disseminated.

For the processing of the data in question, explicit consent is required from the User, pursuant to Article 9, paragraph 1, GDPR. However, we inform you that the provision of these data is mandatory and any refusal to provide such data may result in the failure or partial execution of the contract.

#### **- Jobs**

The "Jobs" section offers the opportunity to express interest in working at our company or to respond to a job announcement for vacant or new positions. If you decide to send your personal data, they will be processed exclusively for these purposes by specially appointed personnel, according to the normal internal personnel management procedures of Cavallino Bianco Caorle Srl.

The personal data we collect and store mainly concern two categories:

- (I) Data provided in your candidate profile, including name, surname, nationality, email address and telephone number;
- (II) Data provided in the documents related to your application (curriculum vitae, cover letter), including professional experience, qualifications and language skills.

These data will be used to evaluate the application, contact you during the recruitment process or for alternative career opportunities in Cavallino Bianco Caorle Srl, or in response to spontaneous applications.

The processing of data is necessary for the processing of the application and for the possible establishment of an employment contract at our hotel (Article 6.1, letter b, GDPR). In addition, there is a legitimate interest to respond correctly to requests or communications from the data subjects (Article 6.1, letter f, GDPR).

#### **- Promotion, marketing and advertising**

The Data Controller will process the Data to send you the following by email:



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- (I) Commercial or promotional communications related to products and/or services;
- (II) Invitations to participate in initiatives or events possibly organised by the Data Controller, also in collaboration with third parties;

In this regard, we would like to inform you that, in order to invite you to take part in initiatives that may be of interest to you, the Data Controllers may take into account your preferences, as shown by your previous reservations and services and, in general, by your relationship with the Data Controller.

This, however, will not have consequences on your rights and freedoms as a data subject, since you will still have the opportunity to access all the products/services offered by the Data Controller and, in addition, there are and will be no restrictions based on the preferences expressed by the data subjects.

The Data Controllers will process your Data in compliance with the principles referred to in the GDPR on the basis of their legitimate interest, as provided for in Article 6, paragraph 1, letter f), GDPR.

In this regard, the provision of personal data for the purpose of carrying out direct marketing is not mandatory and is not a necessary requirement for the conclusion of the hotel and/or catering contract; pursuant to Article 21, paragraphs 2 and 3 of the GDPR, the data subject has the right to object at any time to the processing carried out for direct marketing, following the instructions at the bottom of each promotional message. Opposition to the processing will have no consequence other than not receiving direct marketing communications.

In addition, if you have given your consent, the Data Controller may process the aforementioned Data to send you commercial and/or promotional communications relating to all the Data Controller's products and services, as well as to invite you to participate in events organised by the Data Controller ("Indirect Marketing").

The processing of your Data for this purpose will be possible only if you have given your consent, constituting the condition of lawfulness. In this regard, we inform you that you have the right to withdraw the previously expressed consent, free of charge and at any time, by means of the link available at the bottom of all the indirect marketing communications you may have received.



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Finally, for all the aforementioned purposes, the processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR)

#### **- Purchase of services, products, vouchers**

Through the site, it is possible to buy products available in our range, thus enjoying the convenience and practicality provided by the online purchase method through the site.

The processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR). We inform you that the provision of these data is mandatory and any refusal to provide such data may result in the failure or partial execution of the contract.

#### **- Newsletter**

This section is aimed at Users interested in receiving electronic communications following an express request, by filling in a special contact form. There is no further processing of the data, with respect to the mere sending of the newsletter. The personal data required to access this service are exclusively the following: first name, surname, and email address, to be included in the special contact form present in the 'newsletter' section.

We inform you that you have the right to cancel the service you have previously expressly requested, free of charge and at any time, by means of the link available at the bottom of all the emails received.

The processing is based on the prior consent of the Users (Article 6.1, letter a, GDPR)

#### **d. Methods and means of processing**

Personal data are processed by automated tools for the time necessary to achieve the purposes for which they were collected.

Specific technical and organisational security measures are observed to prevent data loss, illicit or incorrect uses and unauthorised access in compliance with the obligations of adaptation to appropriate safety measures. In fact, all the data will be acquired and stored in accordance with Articles 32, 33 and following of the GDPR. Cavallino Bianco Caorle Srl adopts security procedures capable of protecting personal data against:

- (I) Unauthorised access;
- (II) Misuse or disclosure;
- (III) Unauthorised modification;



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(IV) Loss or destruction, whether accidental or caused by an unlawful act.

The Data Controller is not responsible for errors, content, cookies, publications of illegal or immoral content, advertising, banners or files that do not comply with the regulatory provisions in force on sites not managed by the same.

#### **e. Recipients, or any categories of recipients, of personal data**

The data are processed within the Company by subjects authorised to process the data under the responsibility of the Data Controller for the purposes indicated above. Personal data will not be communicated to other companies without your explicit consent.

However, only where strictly necessary, the Data Controller may share personal data with: other Users for reasons related to the services; suppliers of IT services, communication, compliance, assistance and customer management; that of Cavallino Bianco Caorle Srl, and business partners for reasons related to the services; suppliers of commercial information; if requested, persons associated with the Users; where required, regulatory authorities, competent courts, law enforcement agencies (including the police), public administrations and, in general, any other Body or Institute for the fulfilment of legal obligations.

These recipients may act as independent data controllers or data processors. The data processors follow the instructions of the Data Controller.

#### **f. Communication and transfer of data to a third country**

With your explicit consent, your personal data may be transferred to external organisations, parties or companies (including consultants and service providers) that the Data Controller uses for the management of the Site and for the performance of activities related, instrumental or consequent to the execution of the services offered by the Site, which may be located in European or non-European countries.

Some of these may not provide adequate data protection guarantees (a complete list of the countries that provide adequate data protection guarantees is available on the website of the Italian Data Protection Authority). In such cases, the Company will ensure that appropriate safeguards are in place to protect your personal data in those countries in accordance with this Privacy Policy. Some of the safeguards that we may adopt, where appropriate, include: the use of standard contractual clauses approved by the European Commission with our suppliers, intra-group transfer contracts (so that we



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can safely transfer your personal data between group companies around the world) and the adequacy of the EU-US Data Privacy Framework (DPF).

#### **g. Links with third-party sites**

Please note that [WWW.CAVALLINO-BIANCO.COM](http://WWW.CAVALLINO-BIANCO.COM) may contain links to other sites that are not governed by this privacy policy.

#### **h. Children under the age of 16**

The website of Cavallino Bianco Caorle Srl governed by this privacy policy is not intended for use by children under the age of 16. We understand the importance of protecting information intended for minors, especially in an online environment, and therefore we do not deliberately collect or maintain personal data relating to minors.

#### **i. Data Retention Period**

The information and personal data will be kept for a period of time not exceeding that necessary to achieve the purposes for which they were collected and processed.

Once the service is completed, all personal data will be destroyed in compliance with Cavallino Bianco Caorle Srl's policies on data retention, unless otherwise requested by the authority and except for storage needs established by law, or as indicated in this policy "measures of the use of the Site [WWW.CAVALLINO-BIANCO.COM](http://WWW.CAVALLINO-BIANCO.COM) for particular sections of this website, or according to its explicit requests, as outlined below.

For the purposes of Customer Satisfaction and the Newsletter, the data will be kept until you have asked not to use them anymore or you request their deletion and, in any case, no later than the duration of the contractual relationship.

The storage time may be extended and involve the acquisition of further data subsequently, in the event that the User himself/herself requests additional services; in this case, the duration of the processing, for administrative, accounting, tax and contractual purposes, may be extended up to 10 years from the termination of the relationship, or, in the event of disputes, for the statutory term provided for by the legislation for the protection of related rights, without prejudice in any case to longer storage periods provided for by specific sector regulations. Transaction data, as well as sensitive data, are kept for up to 2 years if no reservations are made in the last 24 months.



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The data provided for pre-contractual purposes will be processed for the time strictly necessary to provide feedback on the requests and communications voluntarily sent by the customer.

The data provided through the sending of the curriculum vitae (CV) will be kept for a maximum period of 1 year from the date of receipt, in order to evaluate the application and be able to contact you as part of the recruitment process. The period could be longer, up to a maximum of 2 years, when the possibility of using and therefore processing the data is mentioned in the training and/or in the vacancy advertisement, also for any positions different from those for which the data subject has applied.

The data processed for the purposes of promotions, marketing, and advertising are kept for a maximum time of 24 months from the date of the release of the marketing consent or from the date of the last interaction with the Data Controller.

The data useful for the execution of statistical analyses will be processed for a maximum period of 24 months from registration, unless the right to oppose the processing is exercised.

In some circumstances, we may anonymise your personal data so that they can no longer be associated with you; in such cases, we may use said data without further notice to you.

#### **j. Rights on data**

Please note that, regarding your personal data, you can exercise the following rights:

1. Right of access to your personal data: You have the right to obtain confirmation about the existence or otherwise of a processing operation concerning your Data, and, where appropriate, the right to receive any information relating to the same processing operation;
2. Right to obtain rectification: You have the right to obtain the rectification of your Data in our possession, when they are incomplete or inaccurate;
3. Right to deletion: In certain circumstances, you have the right to obtain the deletion of your Data present within our files if it is not relevant for the purposes of the continuation of the contractual relationship or necessary to fulfil a legal obligation to which the Data Controllers are subject or for the assessment, exercise or defence of their right in court;
4. Right to limitation of processing: upon the occurrence of certain conditions, you have the right to obtain the limitation of the processing concerning your Data;



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5. Right to portability: upon the occurrence of certain circumstances, you have the right to obtain the transmission of your Data in our possession in favour of a different data controller;
6. Right to oppose the processing: You have the right to oppose, at any time for reasons related to your particular situation, the processing of Data concerning you based on the condition of lawfulness of the legitimate interest or the execution of a task of public interest or the exercise of public powers, including profiling, unless there are legitimate reasons for the Data Controller to continue the processing that prevail over the interests, rights and freedoms of the data subject or for the assessment, exercise or defence of a right in court;
7. Right to withdraw consent: You have the right to withdraw your consent to the processing of your Data at any time, without prejudice to the lawfulness of the processing based on the prior consent of the revocation.

With regard to the methods of exercising the aforementioned rights, the data subject may write to the Privacy Coordinator.

#### **j. Complaints**

The data subject is informed that he/she has the right to lodge a complaint with the independent administrative authority competent in the Member State of the European Union where he/she usually resides, where he/she works, or where an alleged violation of the law on the protection of personal data has occurred. In Italy, the data subject may file a complaint with the Data Protection Authority (Tel: 06/69677.3785, website: [www.garanteprivacy.it](http://www.garanteprivacy.it)).

#### **k. Provision of data**

The provision of some data is necessary to allow the Company to fulfil the contractual obligations, such as accounting and tax obligations; any refusal to provide the requested data or the authorisation to process them, will not allow the contractual relationship to be finalised or to be fully and regularly executed, insofar as such data are necessary for its execution.

For other services, on the other hand, the provision of data has no consequence other than not being able to use the service (e.g. marketing, newsletters).



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#### **l. Different purposes of data processing**

It is specified that if the Data Controller intends to further process the personal data for a purpose other than that for which they were collected, before such further processing, the Data Controller will provide the data subject with information about this different purpose and any other relevant information.

#### **m. Profiling**

The Data Controller may use automated processes aimed at profiling.

The Data Controller,