

Privacy Policy Statement in accordance with Articles 13 and 14 of Regulation (EU) 2016/679

This statement provides detailed information on the protection of personal data by **Villa Donini Srl** is responsible for, and in its capacity as the Data Controller of your personal data (hereinafter also "Data"), will process the data in relation to the services requested and its activities. The purpose of this document is to inform you, as an interested party and/or employee of a company adhering to **Villa Donini Srl**, about which of your personal data we process, the reasons why we process this data and share it, the legal basis for the processing we carry out, the period of time for which we keep the data, and how to exercise your rights. Further information may be provided to you if necessary, and further consent may be requested of you, in the event of your requesting a specific service when such additional service requires the processing of personal data other than and/or in addition to the data described below.

1. Who is the Data Controller and how can they be contacted? Are there Joint Data Controllers? Who is responsible for data protection?

The Data Controller is:

Villa Donini Srl, Via Deruta 43, 06132 San Martino in Campo, Perugia (PG), Tel. e Fax +39 075609132, privacy@postadonini.it.

There are no joint controllers of the processing, i.e. there are no other data controllers with whom we jointly determine the ways and purposes of processing your personal data.

2. How do we collect personal data?

If you contact us directly, for example through our website, via email or by telephone through our direct line, in order to request information about our services.

If your contact details are communicated to us by a third party with your consent.

If partners legitimately transfer your personal data to us.

If you participate in an event organized by us.

If you provide personal data on behalf of someone else, it is your responsibility to ensure before doing so that the individuals who are part of the company have read this Privacy Policy Statement.

If you are under 18 years of age, please do not provide us with any personal information.

3. Which categories of personal data do we collect?

The following categories of personal data concerning you may be collected through the various services and contact channels described in this Privacy Statement:

- a) Contact details: information regarding your name, address, telephone number, email address.
- b) Payment details: Information regarding the payment systems chosen by you, e.g. bank details and/or IBAN identifier.
- c) Images: images that portray your person collected through photos and/or videos made at events organized with us.
- d) Interests and preferences: Information that you provide us about your interests, including the type of treatment or service you prefer (for example: accommodation at our rooms, reservation at our restaurant) o the kind of services that you prefer to book (for example: Donini Spa, organization of event in one of our Meeting Center).

- e) Other personal details: date of birth, education or professional status to personalized the service.
- f) Use of the Company website: Information about how you use our website, opens or forwards our communications, including information collected through cookies and other tracking technologies

4. What are the purposes and legal prerequisites for processing your personal data (purpose and legal basis for processing)?

Within the limits of the purposes and procedures described in this Statement, information may be processed that can be considered as “**Simple or Common Personal Data**,” which include your personal details, your bank details, your contact details (such as, for example, mobile phone number, email address. Hereinafter they will jointly be referred to as “**Personal Data**”) and as “**Sensitive Data**” (personal data that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or union membership, as well as genetic data, data related to health or sex life or sexual orientation).

In general, personal data will be processed in accordance with the various legal bases that can be used for the different purposes, using requests for consent when required by applicable law.

The data will be used for carrying out the tasks and functions recognized by the national and regional trade union agreements and understandings, as well as by the by-laws of the Institution on the basis of the provision of the services and the subsidies envisaged by the Institution itself.

More specifically, the Personal Data and the Sensitive Data collected will be processed for the purposes and in accordance with the following legal bases:

Type of Data	Purposes	Legal Basis	Consequence of failure to provide data and/or consent when requested
a), b)	Provision of services and contributions requested in the terms in which they are provided, therefore, by way of example, for the supply of services and related fulfillments	contract (Art. 6, par. 1., letter b) Reg. EU 2016/679)	impossible to establish a contractual relationship
a), b) and c)	Regulatory fulfillment Exemplify, invoicing, law communications, etc.	Legal obligation (Art. 6, par. 1, letter c) Reg. (UE) 2016/679	impossible to establish a contractual relationship
d), e) and f)	Improvement and personalization service Customization and / or improvement of the service in relation to particular conditions, etc.	consent (Art. 6, par. 1., letter a) Reg. EU 2016/679)	Impossible to personalized and improve the service
a), d), e) and f)	satisfaction level For the completion and subsequent use of surveys, conducted directly or through specialized professionals, and to contact you at the addresses provided in order to verify the quality of service rendered to you and your satisfaction *. * These activities will still be limited and limited, in the spirit of discretion of our company.	consent (Art. 6, par. 1., letter a) Reg. EU 2016/679)	Impossible to contact you to know the satisfaction level
a), d) and e)	Marketing, i.e. communication for commercial/promotional purposes	consent (Art. 6, par. 1., letter a) Reg. EU	impossible to receive promotional and

	carried out via email, instant messaging applications (e.g. Whatsapp or text message or other type of automated communication;)	2016/679) Legitimate interest of the Controller (Art. 6, par. 1., letter f) Reg. EU 2016/679)	commercial communications
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5. How does your personal data processing take place?

The processing of Personal Data and Sensitive Data will be done using manual, computerized or telematic tools suitable for guaranteeing their security and confidentiality, and will be carried out by personnel duly trained to comply with applicable law.

In addition to cases in which it is necessary to contact you for needs connected with the management of our relationship with you, you may be contacted via email, text message, or through any equivalent electronic device or by paper mail or call from an operator to all the contact details provided. If you prefer to be contacted at only one or some of these addresses, you can specifically request this by sending a request to the following email address: **privacy@postadonini.it**

If you express your consent in relation to the purposes referred to in the preceding paragraph 4, your personal data will be made visible and stored in a customer relationship management (CRM) database, and may possibly be stored also in one or more appropriate archives or databases of the company.

6. To whom are your data communicated?

For the aforementioned purposes and within the limits indicated in this statement or indicated by the regulations in force, your personal data may be communicated to subjects who, in various capacities, collaborate with the Data Controller to achieve said purposes. The data collected will in no case be disseminated. A specification of the categories of recipients is given below.

Categories of Recipients	Purposes of the Communication
individuals within the Institution, specifically authorized and instructed	management of operational activities, according to the profiles and tasks assigned
outside professionals	formulation and supply of professional consultancy and operational services (lawyers, accountants, work consultants)
service companies (business services, communications companies, IT services companies, etc.)	Preparation of IT platforms for telematic procedures regarding service requests (web companies, ICT)
financial or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law;	fulfillment of regulatory obligations
partners or third parties for promotional activities	promotional activities, including those of third parties

There is no transferring of data outside the EU territory, not even for the use of "cloud" services.

If, in accordance with the foregoing and for the purposes indicated therein, it becomes necessary to transfer abroad [outside the EU] the personal data of the natural persons who are part of the company, it will be done on condition that the country of destination has been considered by the European Commission as adequate for transfer pursuant to Art. 45 of Regulation 2016/679 or if one of the conditions set out in Articles 46 and 47 of the same Regulation applies [standard contract or binding corporate rules]

7. For how long are your data stored?

CATEGORY	PURPOSES	CONSERVATION OF DATES
a), b)	Executed Contract	For all duration of the relationship and then later for 10 years from the termination of contract in according

		to the general limitation period prescribed by the Civil Code.
c)	Public security communications	Time prescribed by law
d), e) and f)	Improvement and personalization of service	Duration of service
a), d), e) and f)	Satisfaction verification	48 months from the date of the data, due to the possibility, frequently in practice, of further relations with you, without prejudice to the possibility of modifying and / or withdrawing your consent at any time.
a), d) and e)	Marketing	24 months from the date of acquisition of your data, without prejudice to the possibility of modifying and / or withdrawing your consent at any time.

8. What are your rights?

The interested parties have the following rights:

Requests for access, correction and cancellation;

You have the right to:

- ask us to confirm if we are processing your personal information;
- receive information on the way in which we process your data;
- obtain a copy of your personal information;
- request us to update or correct your personal information;
- ask us to delete personal information, in certain circumstances.

Right to object to processing;

You have the right to request that the processing of your personal information be interrupted:

- for marketing activities;
- for statistical purposes;
- where such processing is based on our legitimate business interests, unless we are able to demonstrate legitimate grounds for such processing or if the processing of your personal information is necessary to establish, exercise or defend a legal claim.

Right to restriction of processing;

You have the right to request that the processing of your personal information be restricted: privacy@postadonini.it

- if you are considering or are taking steps to respond to a request to update or correct your personal information;
- where the processing is unlawful but you do not want your personal data to be erased;
- where we no longer need or request the personal data, but you want us to keep the data to establish, exercise or defend a legal claim;

- where you have objected to processing on the basis of our legitimate business interests and pending our response to said request.

If we restrict the processing of your personal information pursuant to your request, we will inform you before involving you again in this type of processing.

Data portability requests: you have the right to request us to provide you or a third party designated by you with some of your personal information in a commonly used electronic format. However, we inform you that the right to data portability only applies to personal information we have obtained directly from you and only if our processing is done automatically, based on consent or performance of a contract.

Sending requests: your requests can be sent to the email address: privacy@postadonini.it

We will respond to all requests of this type within 30 days of receipt of the request, unless there are mitigating circumstances, in which case it may take up to 60 days for the response.

We will inform you if we foresee that it may take more than 30 days for our response.

However, some personal information may be excluded from these rights under applicable data protection laws. Moreover, we will not respond to any request unless we can adequately verify the applicant's identity. We may charge you, when envisaged by the regulations, a reasonable amount for the subsequent copies of the data you are requesting.

Right of withdrawal of consent: you have the right to withdraw your consent to any processing that we carry out exclusively on the basis of your consent (such as sending direct marketing materials to your personal email address). You can withdraw your consent to marketing activities by following the instructions given in any marketing email or by contacting the address: **privacy@postadonini.it**. The withdrawal of consent does not however prejudice the lawfulness of the processing based on the consent done prior to the withdrawal.

Right to lodge a complaint with the supervisory authority: you have the right to lodge a complaint according to the procedures and time limits laid down by law before the supervisory authority (Authority for the Protection of Personal Data).

We do not use automated decision systems and we do not resort to profiling.

Our services are not intended for minors and we do not knowingly collect data concerning them.