

# Privacy

## **Data protection**

**Effective date: 25/05/2018**

In accordance with the ORDINANCE (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, we inform you that we will process personal data of customers and suppliers, as well as data of persons who communicate their data willingly (personally, by phoning, by faxing or by e-mailing to us) and by registering on our website, as well as persons whose data have been acquired by third parties, for example when collecting external data for business information, public directories, etc., whereas in the latter case only personal data of ordinary / common kind and nature is concerned.

Our company guarantees within the framework of legal regulations that the processing of personal data takes into account the fundamental rights and freedoms as well as the dignity of the person concerned, with particular reference to secrecy, personal identity and the right of protecting personal data.

### **Target and purpose positions in data processing:**

- fulfillment of legal obligations, duties arising from regulations, community norms as well as civil and tax laws
- fulfillment of any contractual obligations to the person concerned
- Performing activities related to the business of our company, such as completing internal statistics, accounting, and managing customer / supplier accounting
- Business objectives such as sending business information and promotional material (by post, fax and e-mail), marketing and market research
- Protection of claims and management of liabilities
- Objectives regarding insurance, especially credit insurance
- area of publication and circulation of data.

### **In relation to the above stated objectives, your personal information will be forwarded as needed:**

- to the public administration and authorities, if stipulated by law

- to credit institutions our company has business relations with, concerning the management of receivables / payables and financial intermediation
- to all those natural and / or legal, public and / or private persons (legal, administrative and tax consulting offices, courts, chambers of commerce, etc.), if the forwarding proves necessary or convenient for the performance of our duties
- to suppliers / manufacturers, for the execution of the orders
- The personal data processed by our company are not subject to circulation.

## **What kind of information is collected from you and for how long?**

### 1. Information provided by the user and collected automatically

The personal data stored by our company are collected directly from customers or third parties, such as the hypothesis that the company acquires data from external companies for commercial information, market research, direct offers of products or services. For this last type of data, an informative notice will be provided at the time of its registration or, in any event, no later than the first possible notice.

In addition, our company may possess data that the law defines as "sensitive" in relation to customer-requested transactions. The law requires a specific consent for their utilization.

Each time you visit our platforms, we may collect information about the devices you use and the networks you are connected to when using our services, in accordance with applicable laws and, where applicable, your consent. This may include: IP address, login information, browser type and version, browser plug-in types and versions, operating system and platform, advertising ID, visit information including the clickstream URL to, from and to our platforms, products viewed or searched, download errors, duration of visits to specific pages, interaction on the pages and any phone numbers used to call our customer service. We collect this information using various technologies, including cookies (see our Cookie Policy for more information).

### 2. Data Storage

Click on this [link](#) to see the retention period of the data.

## **Type of data processing:**

The data processing may be carried out with or without the aid of electronic means - in any case automatic - and includes all the operations required and necessary for the data processing concerned. In any case, the data processing will be carried out in compliance with all security measures that ensure their security and secrecy.

## **Online advertising**

For advertising purposes, based on your interests and to display targeted online advertising based on the use of cookies, we may also combine the data collected by cookies with other data we have collected. If you do not want information to be processed through the use of cookies, [read our Cookies section](#) to learn how to review and disable this information. [Please note that the exclusion of interest-based advertising does not prevent the display of advertising that is not based on your interests.](#)

Third parties who act as processors of such contractual processing guarantee that they will not store the data received from the client and will not use them for other purposes. Our contractors are contractually committed to use the same privacy and security standards, and we ensure that they are complied with.

## **Navigation data in the context of our Internet information service:**

The computer systems and procedures provided for the function of the **[dulachotel.com](#)** website collect certain personal information during normal operation, the transmission of which is subject to the use of data exchange protocols on the Internet.

It is information that is not collected to associate with identified persons but, by their nature, enables users to be identified by processing and linking to third party data. This category of data includes the IP addresses or domain names of the computers that connect to the website, the Uniform Resource Identifier (URI) addresses of the resources requested, the time of the request, and other parameters related to the transfer and the data communication of the user's computer environment.

These data are used only for the purpose of collecting anonymous statistical

information when using the Website to verify that it works correctly. The data in question may be used to establish liability in the case of offenses by means of information technology to the detriment of our website.

### **Transfer of data abroad:**

We may need to submit your data to service providers in non-European countries (EEA). The EEA consists of countries of the European Union and Switzerland, Iceland, Liechtenstein and Norway, which are considered to be countries with equivalent data protection and privacy laws. This type of data transfer may occur if our servers (i.e. where we store data) or our suppliers and service providers are located outside the EEA or if you use our products and services during your stay in countries outside the EEA from this area.

The updated list of third countries to which the company may transfer data is available on request to the data controller.

If such transfer takes place, we will ensure that it is in accordance with this Privacy Policy and that it is governed by standard contractual clauses approved by the European Commission that provide reasonable protection for the parties concerned.

### **Rights of the person concerned:**

The Basic Data Protection Regulation 679/2016 gives the data subject the opportunity to exercise certain rights. In particular, it has the right to obtain information on whether and what kind of its data exist and to obtain in an understandable form details of such data, their origin and the reason for and purpose of their processing, as well as details of the holder and controller of the processing and persons and categories of persons to whom such data may be transmitted.

The data subject has the right to update, correct and complete his data and to request that the data be deleted, blocked and converted into anonymous data if the processing violates the legal provisions. He has the right, for a justified reason, to oppose, in whole or in part, the processing of his data, and for no justified reason, to use data for the purposes of trade information, the sending of advertising material, direct sales, market research and opinion polling.

In addition, from 25 May 2018 onwards, the right to data portability will apply. For more information, please contact the data controller.

If you believe that your rights have been violated, you have the right to lodge a

complaint with the competent data protection authority (Garante della Privacy) or to take legal action.

The rights can be asserted on the part of the person concerned or a person commissioned by him, by means of a request to the person responsible for data processing at the **[owner-en]** – Località Lago N° 2 - I-38056 Levico Terme (TN) - by registered mail or e-mail to [info@dulachotel.com](mailto:info@dulachotel.com)

Holder of the data processing:

### **[owner-en]**

Località Lago N° 2  
I-38056 Levico Terme (TN)  
T. +39 0461 706590  
[info@dulachotel.com](mailto:info@dulachotel.com)

### **Time information for the data storage of personal data**

The processing of personal data takes place in accordance with the information contained in this privacy policy. Regarding the data storage of the data processed by us, we inform you about the following retention periods:

- 5 years after the last data processing, regarding the established business relationship;
- 5 years after expiry of the notified period of validity of the offer.

The following categories of personal data may be stored for different periods of time:

- Financial information (such as payments, refunds, etc.) will be retained for the duration required by applicable tax and accounting rules;
- All user-generated content (e.g. comments and ratings) is anonymous, but remains available on our platforms.

### **Privacy policy for the using of Google Analytics**

"This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States . Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above."

Privacy Policy & Terms of

Use: <https://policies.google.com/technologies/partner-sites>

Cookie-policy Google

Analytics: <https://www.google.com/intl/en/policies/privacy/>

Cookie-policy Facebook: <https://it-it.facebook.com/about/privacy/cookies>