

La Nuova Ghilardi Eugenio srl - Hotel Esplanade  
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## **Personal Data Privacy Policy pursuant to Articles 13 and 14 of the European Regulation 2016/679 ("GDPR")**

This page describes how this website is managed as regards the processing of the personal data of users who visit it. This Privacy Policy is provided in compliance with the current regulations regarding the protection of personal data (EU Regulation 2016/679 - Legislative Decree 196/2003), to those who consult the pages of this website (hereinafter also referred to as the "Website") or who use the services made available on the same.

The Privacy Policy is provided exclusively for the website of the Data Controller and not for other websites that may be consulted by the user through the links on the website.

### **1- Data Controller**

The Data Controller, namely the person who determines the purposes and means of the processing of personal data and who you can contact to exercise the rights recognized by the GDPR is La Nuova Ghilardi Eugenio srl - Hotel Esplanade.

### **2- Sources and category of processed data, nature of the provision**

The personal data processed are collected mainly from the user while browsing the website.

The Data Controller processes the following categories of data: browsing data. During their normal operation, computer systems and software procedures used to operate this website acquire some personal data, the transmission of which is implicit in the use of internet communication protocols. This information is not collected with the intention of associating it with identified users. However, by its nature, it could allow users to be identified through processing and association with data held by third parties. This category of data includes the IP addresses or domain names of computers used by users connecting to the website, the URI (Uniform Resource Identifier) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the response from the server (successful, failed, etc.) and other parameters about the operating system and the computer environment. These data are only used to obtain anonymous statistical information about the use of the website and to check its correct functioning; these are deleted immediately after processing. The data may be used to establish responsibility in the event of hypothetical computer offences which damage the website: except for this eventuality, at this stage, the data on the web contacts is not kept for more than seven days. Data provided voluntarily by users. The registration of personal data, including details (so-called "sensitive"), on the specific page of the website, aimed at requesting services, access to the reserved areas of the website, the request to send the newsletter, optional, explicit or voluntary sending of e-mails to the addresses indicated on this website, involves the subsequent acquisition of the sender's address, which is needed to respond to requests, and any other personal data included in the message. Specific summarised data will be progressively shown or displayed on the website pages dedicated to particular services requested. Cookies. No personal data of users is collected by the website. We do not use cookies to transmit information of a personal nature or use so-called persistent cookies or any kind, or systems for tracking users. The use of so-called session cookies (which are not stored permanently on the user's computer and disappear when the browser is closed) is strictly limited to the transmission of session identifiers (which consist of random numbers generated by the server) that are needed to enable safe and efficient exploration of the website.

The so-called session cookies used in this website avoid the use of other computer techniques that could potentially compromise the confidentiality of users' navigation, and do not permit the acquisition of the user's personal identification data.

### **3- Voluntary submission of data**

Subject to the specifications made with regard to navigation data, users are free to provide the personal data either to be entered in the service request forms or otherwise indicated in the contacts with our offices to request the sending of the newsletter, informative materials or other communications.

Failure to provide such data may make it impossible to obtain what is requested.

#### **4- Processing methods.**

Personal data are processed by automated tools only for the time strictly required to achieve the purpose for which they were collected.

Specific security measures are observed to prevent the loss of data, illicit or incorrect use and unauthorised access.

#### **5- Rights of Data Subjects.**

The subjects to which the personal data refer have certain rights (right of access, right of rectification, right to cancellation, right of limitation of processing, right to data portability, right of opposition, right not to be subjected to a decision based solely on automated processing, including profiling) if and as applicable (Articles 15 to 22 of the GDPR). They also have the right lodge a complaint with the supervisory authority, in accordance with the procedures established by current legislation.

The Data Subject may request to exercise these rights using the contact details of the Data Controller.