

PRIVACY POLICY TORREROSAZZA.COM (the "Website")

In carrying out its activities, Genagricola SpA processes personal data in compliance with the legislative and contractual provisions in force, in a manner based on the principles of correctness, lawfulness and transparency, protecting the confidentiality of the interested party and his/her rights.

Navigation on the Website is free and does not require registration except in the event that the user is interested in using certain services for which it is necessary to provide some personal data.

1. OWNER AND RESPONSIBLE FOR DATA PROCESSING

By means of this document, Genagricola SpA, in its capacity as personal data controller (hereinafter, "Data Controller"), intends to provide the information referred to in Articles 13 et seq. of EU Regulation 679/2016 (hereinafter, the "GDPR"), with reference to the processing of personal data of users (hereinafter, "User/Users") who consult the site <https://torrerosazza.com> (hereinafter, "Website").

For information about your personal data collected, the purposes for which they are collected and the entities with which they are shared, please contact the Data Controller.

Data Controller

Genagricola SpA Via Trento, 8

34132 TRIESTE (TS) – Italia

E-mail address of Data Controller: privacy@genagricola.it

Responsible for Data Processing

Divinea Srl

Corso di Porta romana 61

20122 MILANO

E-mail address of Responsible for Data Processing: info@divinea.com

2. TYPES OF DATA COLLECTED

a) **Navigation data:** the computer systems and software procedures used to operate this Website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected to be associated with identified data subject, but which by their very nature could, through processing and association with data held by third parties, allow users to be identified. This category of data includes IP addresses or domain names of the computers used by users who connect to the Website, the addresses in the Uniform Resource Identifier (URI) notation of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (success, error, etc.) and other parameters relating to the operating system and the user's IT environment. These data are used for the sole purpose of obtaining anonymous statistical information on the use of the Website and to check its correct functioning and are deleted immediately after processing.

The data could be used to ascertain responsibility in case of hypothetical IT crimes to the detriment of the Website: apart from this eventuality, the data on web contacts do not persist for more than seven days.

b) **Data provided voluntarily by the User through the “contact” section of the Website or by sending an email info@torrerosazza.com and booking@torrerosazza.com** submitting a contact email, involves the processing of User data for the sole purpose of replying to the request and fulfill the related administrative obligations. The data being processed are: name, e-mail.

c) **Data provided voluntarily by the User for receiving promotional communications related to the products, events and promotion of Torre Rosazza** in the event that the User signs up for the newsletter service or expresses his consent for the receipt of commercial communications by the Data Controller, the data will be processed for sending such communications by e-mail or ordinary mail, to the addresses provided by the User. The data being processed are: name, e-mail, domicile.

d) **Data supplied in order to use the services and purchase visits and/or overnight stays at the Cantina:** if the User is interested in purchasing a service, he or she must provide all the data necessary to manage the purchase; if the data is not provided or is incomplete, the purchase cannot be completed. If data from third parties is provided, the User must ensure that the latter are informed and consent to the use of their data in accordance with this information notice.

d) **Cookies:** for the process of data through cookies, please take a look to the relevant policy ([LINK](#))

3. PURPOSES OF THE PROCESSING AS WELL AS THE LEGAL BASIS FOR THE PROCESSING

User's data collected are processed by the Controller for:

- **FUNCTIONING OF THE SITE:** to pursue a legitimate interest of the Controller, consisting in ensuring the safety of the Website and the information exchanged therein, that is the capacity of such Website to resist, at a given level of security, to unforeseen events or acts illicit or malicious that compromise the availability, authenticity, integrity and confidentiality of personal data stored or transmitted and the security of the related services offered or made accessible. The legal basis for processing is art. 6, par. 1 lett. f) of GDPR.
- **USE THE CONTACT REQUEST:** to reply to the requests submitted by the data subject. The legal basis for processing is art. 6, par. 1, lett. b) of GDPR, being the processing necessary the execution of the contract of which the data subject is a party;
- **SENDING OF COMMERCIAL\PROMOTIONAL COMMUNICATIONS, INVITATIONS TO EVENTS/WORKSHOP OF THE DATA CONTROLLER:** if the data subject has expressed his explicit consent, to receive invitations events organized by the Controller or for sending promotional communications related to the activity of the Controller, including market research. The legal basis for processing is art. 6, lett. a) of GDPR, ie the consent of the data subject.
- **PROCESSING OF PURCHASES:** all data necessary for the management of purchases. The legal basis of the processing is art. 6, par. 1, lett. b) and c) of GDPR, since the processing is necessary for the execution of the

sales contract to which the person concerned is a party, in addition to fulfilling the relative legal obligations, and managing the services connected to the purchases also in the post-sales phase.

4. MANDATORY/OPTIONAL NATURE OF PROVIDING DATA

Providing the data referred to in point 2, lett. b) is optional. In case of refusal, however, the User will not be able to use the contact service.

Providing data referred to in point 2, lett. c) is optional. The User can withdraw his consent at any time and without indicating the reasons. The easiest way to do this is to click on the "Unsubscribe" link, which is available in every newsletter or communication received. The User can alternatively send a communication to the Data Controller at Via Mons. P.L. Zovatto 71 30020 Loncon di Annone Veneto (VE)

The processing of the data referred to in point 2, let. d) will take place without the consent of the User.

5. MODE OF PROCESSING THE DATA

The processing will be carried out both on paper and electronically, with the help of modern computer systems and manual procedures, only by persons expressly appointed for this purpose. The processing will take place with logic and through forms of organization of data strictly related to the obligations, tasks or purposes mentioned above. The Data Controller and the Responsible for Data Processing use technical and organizational measures to protect the data in their possession from manipulation, loss, destruction and against access by unauthorized persons. Security measures are constantly improved on the basis of technological development.

6. DATA DISCLOSURE

The User's personal data will be processed by parties authorized to perform these tasks, duly appointed as data processors or in charge of processing, equipped with security measures to guarantee the confidentiality of the data subjects to which the data refer and to avoid undue access to third parties or unauthorized personnel. If necessary, the data collected may be communicated, within the limits strictly relevant to the obligations, tasks or purposes referred to in point 3, to public or private subjects (insurers, auditing and certification companies, etc.) or competent Authorities for the purpose of prevention, detection or repression of crimes, with the observance of the rules that regulate the matter. No data will be disseminated.

The updated list of all Data Processors is available at Genagricola Spa's office and may be requested at the following e-mail address privacy@genagricola.it . Such list may be updated from time to time.

The user's data, stored on electronic media, are kept, and archived on servers located in the European Union.

7. RETENTION TIME

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. For the purposes referred to in art. 2) herein above personal data will be processed for the

period strictly necessary for the pursuit of the aforementioned objectives and also subsequently, for the fulfillment of legal obligations and/or for defensive purposes.

The data provided for commercial communications activities, opinion polls and market research will be stored until the request by the data subject to interrupt such activity or for 2 years.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

8. USER'S RIGHTS

Users have the right to know their rights, essentially consisting of the right to receive from the other contractual party information about the existence of the processing of their personal data, as well as access to their data, to obtain rectification, integration, update, erasure, or block. Furthermore, the User will also have the right to obtain a copy of his data, limitation of processing and/or to oppose to their processing, as well as the right to data portability and to submit a complaint with the competent control Authorities at the conditions and within the limits indicated in art. 13 of GDPR.

Each data subject has the right to the following pursuant to articles 15 and following of GDPR: right to be informed; right of access by the data subject; right to rectification; right to erasure ('right to be forgotten'); right to restriction of processing; right to data portability; right to object.

The data subject can therefore know what personal data are held by Data Controller, their origin and how they are used, request the updating, correction, or integration and, in the cases provided for by the provisions in force, the cancellation, the limitation of treatment or oppose to their treatment. Each data subject may, if he wishes, request to receive a copy of the personal data held by the Data Controller in a format readable by electronic devices and, where technically possible, the Data Controller may transfer the data directly to a third party indicated by the User.

If the User considers that the processing of his/her personal data has been carried out illegitimately, he/she can file a complaint with one of the competent control Authorities for compliance with the rules on the protection of personal data. In Italy, the complaint can be filed to Garante per la Protezione dei Dati Personali (<http://www.garanteprivacy.it/>).

9. EXERCISE OF RIGHTS

To exercise the aforementioned rights, Users can send a communication to the following email address privacy@genagricola.it, indicating the subject "Privacy - exercise of rights".

This Privacy Policy was published on 09/ 21. Any updates will always be published on this page.