

Privacy Policy - Corte Grimani Inn S.r.l.

Last update: 10/02/2022 - V. 1.1

What is this document? Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, Corte Grimani Inn S.r.l. intends to inform each user (the “**User**”) about the processing of personal data happening on its website www.cortegrimani.com (the “**Website**”).

1. Controller and Contact details

Corte Grimani Inn S.r.l. (hereinafter “**Controller**”, pursuant to art. 4(7) GDPR) with registered offices in Corte Grimani, S.Marco 4402 - 30124 Venezia.

Contact details: info@cortegrimani.com

2. Purposes of processing, Legal Basis, Personal Data and Retention period

The Controller processes Personal Data for the following purposes, as specified here in below. The following table also shows the legal basis which justifies the processing and the period of data retention.

Purposes	Personal Data	Legal Basis	Data Retention
A) Management of booking request and accommodation	✓ Anagraphic information (Name and surname) ✓ Financial details (credit card number) ✓ Contact details (email, phone number)	Performance of pre contractual and contractual provisions [Art. 6, 1, lett. b) GDPR]	Until the expiry of the data retention period, as provided by the applicable law, and according to Articles 2946 et seq. of the Italian Civil Code.
B) Send materials for marketing purposes (by mail, SMS or email).	✓ Anagraphic information (Name and surname, address) ✓ Contact details (email, phone number)	Consent [Art. 6, 1, lett. a) GDPR]	Until withdrawal of consent and, in any case, not later than 24 months from the date of last contact.

C) Profiling to analyze your purchasing habits in order to address commercial proposals.	<ul style="list-style-type: none"> ✓ Anagraphic information (Name and surname) ✓ Contact details (email) 	Consent [Art. 6, 1, lett. a) GDPR]	Until withdrawal of consent and, in any case, not later than 12 months from the date of last contact.
D) Allow the Controller to accomplish all formalities required by law.	<ul style="list-style-type: none"> ✓ Anagraphic information (Name and surname) ✓ Home address ✓ Contact details (email) 	Legal obligation [Art. 6, 1, lett. c) GDPR]	Until the expiry of the data retention period, as provided by the applicable law.
E) Improve the website by analyzing how Users navigate and/or use the Website.	<ul style="list-style-type: none"> ✓ IP Address 	Legitimate interest [Art. 6, 1, lett. f) GDPR]	Not applicable (aggregate or anonymous data).
F) Detecting or preventing fraudulent activity and exercising the Controller's rights in Court	<ul style="list-style-type: none"> ✓ Anagraphic information (Name and surname) ✓ Contact details (email) ✓ IP Address ✓ domain names of the computers utilised by users accessing the site ✓ URI Address (Uniform Resource Identifier) of booking request and the time when the request is made. 	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years

The processing of Personal Data referred to in point (A) is necessary for the performance of the contract signed by the User, or in order to take steps at request prior to entering into a

contract with the User. Any refusal makes it impossible for the Controller to fulfil that purpose.

The processing of Personal Data referred to in point (B) is voluntary. The absence of User's consent shall have no impact on the completion of the contract.

3. Processing modalities

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

4. Data sharing

Your Personal Data may be shared with the following external subjects: (i) Internet service providers, software companies and platforms used by the Controller as communication and promotion channel or for booking services (e.g. Nozio S.r.l. for the booking service); ii) consultants and other third-party service providers who perform services for us or on our behalf and require access to such information to do that job; iii) authorities, government agencies, or judicial courts to meet any applicable law, regulation, legal process, or enforceable governmental request.

These subjects act as autonomous Data Controllers or Data Processors. In the latter case, the Controller has signed a contract pursuant to Art. 28 GDPR (Data Protection Agreement or "DPA").

The list of data processors is available by sending a request to the Data Controller at info@cortegrimani.com.

Personal Data will also be processed by the Controller's internal staff specifically authorised pursuant to Article 29 of the GDPR.

5. Data Processing Locations

Personal data are processed and stored at the headquarters of the Controller, as well as in the servers that host the Website and the booking engine software established in EU. Transfers of Personal Data outside the EEA shall be carried out only with appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

6. Data subject's rights

The User may exercise all the rights provided for by Articles 15-21 of GDPR, at any time and without unjustified limitations, by contacting the Data Controller at info@cortegrimani.com. Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

- obtain from the Controller confirmation as to whether or not Personal Data are being processed (Art.15);

- obtain from the Controller the rectification of inaccurate Personal Data or the completion of inaccurate ones (Art. 16);
- obtain from the Controller the erasure of Personal Data (Art. 17);
- obtain from the Controller restriction of processing (Art. 18);
- have the right to receive his/hers Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- have the right to object (Art. 21);
- with regard to the purposes of processing based on consent, withdraw that consent at any time.

7. Complaints

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller's processing of their Personal Data is in violation of the applicable law.

8. Amendments

The Controller reserves the right to amend and update that Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.