

INFORMATION ON THE PROTECTION OF PERSONAL DATA

EU Regulation 2016/679 "General Data Protection Regulation"

Dear Supplier,

In accordance with Article 13 of EU Regulation 2016/679 "General Data Protection Regulation" (hereinafter "Regulation"), Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas (hereinafter "Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas" or also "Data Controller") hereby informs you of the purposes and methods of processing your personal data.

1. Identity and contact details of the data controller.

The data controller pursuant to Articles 4, no. 7) and 24 of the Regulation is Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas with registered office in Strada Comunale di Ripa D'Orcia, SNC – 53027 San Quirico D'Orcia (SI) whose contact details are:

- Telephone: +39 0577 898307
- Fax: +39 0577 898307
- Email address: info@sarnaresidence.it

2. Definition of personal data and information relating to processing activities

Pursuant to the Regulation, personal data means: *any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person*.

For the purposes of this disclosure, your personal data and that of any of your collaborators will be acquired directly from you; the processing will concern the following categories of identifying data:

- personal data (name, address, telephone, fax, e-mail, ...);
- data relating to economic and commercial activity (banking data, accounting and tax data, etc.);

In any case, the Data Controller undertakes to ensure that the information collected and used is appropriate for the purposes described in the following paragraph and that this does not result in an invasion of your personal sphere.

3. Purpose of the processing for which the personal data are intended.

Your personal data and that of any of your collaborators will be processed by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas for the following purposes:

1. carrying out pre-contractual negotiations;
2. execution of contracts entered into or to be entered into with you and related commitments;
3. fulfillment of obligations set forth by laws, regulations, and European standards (e.g., accounting and tax obligations, administrative audits), as well as by provisions issued by authorities or bodies authorized to do so;
4. protection of contractual rights.

4. Legal basis for processing.

The processing of your personal data does not require your consent for the purposes referred to in points 1) to 4). The legal basis for processing for purposes 1) to 3) is processing necessary for pre-contractual negotiations and the performance of a contract to which you are a party, and the legal obligations imposed on Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas by laws, regulations, European standards, and provisions issued by authorities or bodies authorized to do so (Article 6, paragraph 1, letters b) and c) of the Regulation). The legal basis for processing for purpose 4) is the Data Controller's legitimate interest in protecting its contractual rights through appropriate channels (Article 6, paragraph 1, letter f) of the Regulation).

5. Any recipients or categories of recipients of the personal data.

Pursuant to the aforementioned Regulation, data processing will be based on the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, and storage limitation. Data processing

will be carried out by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas using appropriate technical and organizational measures to ensure the integrity, confidentiality, and availability of your data using paper, electronic, IT, and telematic means. Employees of Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas may access your personal data, in accordance with the principle of necessity and in their capacity as data processors. These individuals have been provided with specific instructions and are required to maintain the confidentiality of your data.

Your personal data may be disclosed, in compliance with the law, to:

- banking institutions for payment management;
- financial administrations and other companies or public bodies in compliance with regulatory obligations;
- Suppliers, professionals, and companies of the Data Controller, to the extent necessary to carry out their duties and subject to obtaining adequate guarantees that impose a duty of confidentiality and security on them (e.g., tax and legal firms, IT system maintenance, management and organizational consultancy, etc.).

Your personal data will not be disclosed. The updated list of data controllers is available by writing to the contact details provided in this policy (section 1 "Identity and contact details of the data controller").

6. Transfer of personal data to a third country or to an international organisation.

Your personal data will be processed at the headquarters of Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas and will not be transferred to a country outside the European Economic Area or to an international organization.

7. Period of retention of personal data.

Your personal data processed by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas will be retained for the time necessary to complete the activities related to managing the contract and for up to ten years following its conclusion or from when the rights deriving from it can be enforced (pursuant to Articles 2935 and 2947 of the Italian Civil Code). This data will also be retained for the fulfillment of obligations (e.g., tax and accounting) that persist even after the conclusion of the contract (Article 2220 of the Italian Civil Code), for which purposes the Data Controller must retain only the data necessary to fulfill them. This does not affect cases in which rights deriving from the contract need to be asserted in court; in this case, your data, only the data necessary for such purposes, will be processed for the time required to fulfill them.

8. Mandatory data communication.

Providing your personal data is a necessary requirement for establishing and subsequently managing the commercial relationship with Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas.

9. Consequences of failure to communicate such data.

We inform you that any refusal to provide your personal data will make it impossible to establish or continue the commercial relationship with Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas.

10. Automated decision-making and profiling.

Your personal data will not be subjected to automated decision-making.

11. Rights of the interested party.

Pursuant to Articles 15, 16, 17, 18, 20, 21, and 22 of the Regulation, we inform you that you, as a data subject, have the right to request from the Data Controller access to your personal data and the rectification or erasure of such data, restriction of processing, or to object to such processing, as well as the right to data portability. Any rectification, erasure, or restriction of processing carried out at your request (unless this proves impossible or involves a disproportionate effort) will be communicated by the Data Controller to each recipient to whom the personal data has been disclosed. The Data Controller may inform you of these recipients upon your request. The exercise of your rights is not subject to any formal requirements; it will be sufficient for you to send a clear communication regarding the right you intend to exercise to the contact details provided in this notice (section 1 "Identity and contact details of the data controller"). We inform you that within the Sarna Residence of Bianchi Oriana in Mangiavacchi & C. Sas a procedure for managing requests is active.

12. Right to lodge a complaint.

Pursuant to Article 77 of the Regulation, we inform you that if you believe that the processing of your personal data violates the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), following the procedures and instructions published on the Authority's official website (www.garanteprivacy.it).
