

INFORMATION ON THE PROTECTION OF PERSONAL DATA EU Regulation 2016/679 "General Data Protection Regulation"

Dear Guest,

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 policy, your personal data and, where applicable, that of your family members will be collected directly from you. The processing will concern the following categories of personal data:

- Identification data: personal details and contact details, tax code and/or VAT number, credit and debit card details provided as a guarantee and/or payment, list of services and products requested and purchased, arrival and departure dates, identification document details, nights spent, family relationships, etc.;
- data defined as "special" by the Regulation for exemption from the tourist tax (health status).

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, legal basis and retention periods.

The personal data requested, yours and any data of your family members, will be processed by Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas for the following purposes:

1. **Acquiring and confirming your booking for accommodation and ancillary services and providing the requested services** : since this processing is necessary for pre-contractual negotiations and the performance of a contract to which you are a party and for its subsequent performance, your consent is not required (Article 6, paragraph 1, letter b) of the Regulation). Providing your data is necessary; if you refuse to provide your personal data, we will not be able to confirm your booking or provide you with the requested services. Processing will cease upon your departure, but some of your personal data may or must continue to be processed for the purposes and in the manner indicated below.
2. **Comply with the obligation set forth in the "Consolidated Law on Public Safety" (Article 109 of Royal Decree No. 773 of June 18, 1931)**, which requires the personal details of guests staying at the property to be communicated to the Police Headquarters for public safety purposes, in accordance with the procedures established by the Ministry of the Interior (Decree of January 7, 2013). Since this processing is necessary to fulfill a legal obligation to which the Data Controller is subject, your consent is not required (Article 6, paragraph 1, letter c of the Regulation). Providing your data is mandatory; if you refuse to provide it, we will not be able to accommodate you at our facility. We do not retain the data acquired for this purpose unless you consent to its retention as set forth in point 5.

3. **Comply with applicable administrative, accounting, and tax obligations** : since this processing is necessary to fulfill a legal obligation to which the Data Controller is subject, your consent is not required (Article 6, paragraph 1, letter c of the Regulation). Providing your data is mandatory; if you refuse to provide it, we will not be able to host you at our facility. We retain the data acquired for this purpose for the period required by the relevant regulations (10 years from the date of the last registration pursuant to Article 2220 of the Italian Civil Code, and beyond in the event of tax audits).
4. **Comply with current administrative obligations regarding the tourist tax** : since this processing is necessary to fulfill a legal obligation to which the Data Controller is subject, your consent is not required (Article 6, paragraph 1, letter c of the Regulation). Providing identification data is mandatory; if you refuse to provide it, we will not be able to host you in our facility. Conversely, providing health data for any exemption is optional and requires your **consent** ; if you refuse to provide it, we will not be able to exempt you from paying the tourist tax. We retain the data acquired for this purpose for the period required by the relevant municipal legislation (5 years).

4. 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 tools. Your identifying information and, only where strictly necessary, sensitive information may be disclosed to employees of Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas, in accordance with the principle of data 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 identification data and, where strictly necessary, even "sensitive" data may be communicated, in compliance with the law, to:

- banking institutions for collection management;
- financial administrations and other companies or public bodies in compliance with regulatory obligations (Revenue Agency, Police Headquarters, Municipality, ...);
- Suppliers, professionals, and/or 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, insurance companies, IT system maintenance and management, 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").

5. 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.

6. Automated decision-making and profiling.

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

7. 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 Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas has implemented a procedure to manage requests from interested parties.

8. Withdrawal of consent.

Pursuant to Article 7, paragraph 3 of the Regulation, we inform you that you remain free to withdraw your consent at any time, without prejudice to the lawfulness of processing based on consent before its withdrawal, by sending a clear, informal communication to this effect to the contact details provided in this policy (section 1 "Identity and contact details of the data controller"). Upon receipt of such a request, the Data Controller will promptly remove and delete the data from the archives and databases used for processing and will inform any third parties to whom the data has been disclosed for the same deletion purposes. We inform you that Sarna Residence di Bianchi Oriana in Mangiavacchi & C. Sas has an active procedure for managing the withdrawal of consent upon request of data subjects.

9. 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).