

Sertorelli Sport Hotel Umbrail S. r. l.

Privacy policy and cookies

Information pursuant to art. 13 of Regulation (EU) No 679/2016 ("GDPR");

Sertorelli Sport Hotel Umbrail S. r. l. protects the confidentiality of personal data and guarantees them the necessary protection from any event that could put them at risk of violation. As provided by the European Union Regulation no. 679/2016 ("GDPR");, and articulated in art. 13, below we provide the user ("Interested Party") with the information required by law regarding the processing of their personal data.

SECTION I

Who we are and what data we process (art. 13, 1st paragraph, letter a, art. 15, lett. b GDPR)

Sertorelli Sport Hotel Umbrail S. r. l. , in the person of his P. T. legal representative, with registered office in Grand Chemin, 30, 11020 Saint Christophe (AO) operates as Data Controller and can be contacted at info@sertorelli-cervinia.it and collects and/or receives information regarding the subject, such as:

1. Personal data

name, surname, address, nationality, province and municipality of residence, fixed and/or mobile phone, fax, tax code, e-mail address(es).

2. Telematic traffic data

Log, source IP address

Sertorelli Sport Hotel Umbrail S. r. l. does not require the Interested Party to provide any particular data details, in accordance with the GDPR (art. 9): personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, as well as genetic data, biometric data designed to uniquely identify a natural person, data concerning a person's health or sexual life or sexual orientation. In case the service requested to Sertorelli Sport Hotel Umbrail S. r. l. If the processing of such data is required, the interested party will receive prior information and will be asked to give consent.

The Data Controller has appointed a Data Protection Officer

(Data Protection Officer -DPO) who can be contacted for any information and requests:

e-mail: info@sertorelli-cervinia.it

Telephone: +39(0)166949797

SECTION II

For what purposes do we need the data of the interested party (art. 13, 1st paragraph GDPR)

The data is used by the Data Controller to process the registration request and the contract for the supply of the chosen Service and/or the purchased Product, to manage and execute the contact requests made by the interested party, to provide assistance, to fulfil the legal and regulatory obligations to which the Data Controller is bound in relation to the activity carried out. Under no circumstances Sertorelli Sport Hotel Umbrail S. r. l. resells the personal data of the interested party to third parties or uses them for undeclared purposes.

In particular, the data of the interested party will be processed for:

1. registration and requests for contact and/or information material.

The processing of the personal data of the interested party takes place in order to carry out the preliminary activities and subsequent to the request for registration, for the management of requests for information and contact and/or sending information material, as well as for the fulfillment of any other obligations arising. The legal basis of these treatments is the performance of the services inherent to the request for registration, information and contact and/or sending information material in compliance with legal obligations.

2. management of the contractual relationship

The processing of personal data of the interested party takes place in order to carry out the preliminary and consequent activities of the purchase of a Service and/or Product, the management of the relative order, the supply of the Service itself and/or the production and/or shipment of the purchased Product, the relative invoicing and payment management, the handling of complaints and/or reports to the assistance service and the supply of the assistance itself, the prevention of fraud as well as the fulfillment of any other obligation deriving from the contract. The legal basis for these treatments is the fulfillment of the services inherent to the contractual relationship and the respect of legal obligations.

3. promotional activities on Services/Products similar to those purchased by the Interested Party (Considering 47 GDPR)

The data controller, even without your explicit consent, may use the contact data communicated by the interested party, for the purposes of direct sales of its Services/ Products, only in the case of Services/Products similar to those being sold, unless the Interested Party explicitly objects.

4. commercial promotion activities on Services/Products other than those purchased by the Interested Party

The personal data of the interested party may also be processed for purposes of commercial promotion, surveys and market research with regard to Services/Products that the Owner offers only if the interested party has authorized the processing and does not object to this.

Such processing may take place, in an automated manner, as follows:

- e-mail;
- texting;
- telephone contact, which can be made:
 1. if the interested party has not revoked his consent for the use of the data;
 2. in the event that the processing is carried out through contact with a telephone operator, the Data Subject is not entered in the register of objections pursuant to Presidential Decree no. 178/2010;

The legal basis for such processing is the consent given by the interested party prior to the processing itself, which can be revoked by the interested party freely and at any time (see *Section III*).

5. information security

The Data Controller, in line with the provisions of Recital 49 of the GDPR, processes, also through its suppliers (third parties and/or recipients), the personal data of the Data Subject relating to the traffic to the extent strictly necessary and proportionate to guarantee network and information security, i. e. the ability of a network or an information system to withstand, at a given level of security, unforeseen events or unlawful or malicious acts that compromise availability, authenticity, integrity and the confidentiality of personal data stored or transmitted.

The Owner will promptly inform the Interested parties if there is a particular risk of violation of their data without prejudice to the obligations arising from the provisions of art. 33 of the GDPR on personal data breach notifications.

The legal basis of these treatments is the respect of legal obligations and the legitimate interest of the Owner to carry out treatments related to the protection of the company's assets.

6. profiling

The personal data of the interested party may also be processed for profiling purposes (such as analysis of the data transmitted and the Services/Products chosen, proposing advertising messages and/or commercial proposals in line with the choices made by the users themselves) only if the interested party has provided explicit and informed consent. The legal basis for such processing is the consent given by the interested party prior to the processing itself, which can be revoked by the interested party freely and at any time (see *Section III*).

7. fraud prevention (recital 47 and Art. 22 GDPR)

1. the personal data of the interested party, with the exception of particular data (Art 9 GDPR) or judicial data (Art 10 GDPR) will be processed to allow controls for purposes of monitoring and prevention fraudulent payments, by software systems that carry out an automated verification prior to the negotiation of Services/Products;
2. If these controls are passed with negative results, it will be impossible to carry out the transaction; the interested party may in any case express his or her opinion, obtain an explanation or contest the decision, giving reasons for the decision to Customer Service contacting: info@sertorelli-cervinia.it;
3. personal data collected for anti-fraud purposes only, unlike the data necessary for the correct execution of the requested service, will be deleted immediately at the end of control phases.

8. protection of minors

The Services/Products offered by the Owner are reserved to subjects legally able, on the basis of the national legislation of reference, to conclude contractual obligations. The Owner, in order to prevent illegitimate access to its services, implements preventive measures to protect its legitimate interest, such as the control of the tax code and/or other checks, when necessary for specific Services/Products, the correctness of the identification data of the identity documents issued by the competent authorities.

Communication to third parties and categories of recipients (art. 13, 1st paragraph GDPR)

The communication of the personal data of the interested party takes place mainly towards third parties and/or recipients whose activity is necessary to carry out the activities inherent to the relationship established and to respond to certain legal obligations, such as:

1. Group companies:

for administrative, accounting and contractual obligations.

2. Third-party suppliers and Group companies:

Provision of services (assistance, maintenance, delivery/shipment of products, provision of additional services, providers of electronic communications networks and services) related to the requested service.

3. Credit and digital payment institutions, banks/postal institutions:

Management of receipts, payments, refunds related to the contractual service.

4. External professionals/consultants and consulting firms:

Compliance with legal obligations, exercise of rights, protection of contractual rights, credit recovery.

5. Financial Administration, Public Bodies, Judicial Authority, Supervisory and Control Authority:

Fulfillment of legal obligations, defense of rights; lists and registers kept by public authorities or similar bodies according to specific regulations, in relation to the contractual performance.

6. Persons formally delegated or having a recognized legal title:

Legal representatives, curators, guardians, etc.

- * The Data Controller imposes on its Third Party suppliers and the Data Processors the respect of security measures equal to those adopted in relation to the Data Subject, restricting the scope of action of the Data Processor to the processing connected to the requested service. The Data Controller does not transfer your personal data to countries where the GDPR is not applied (non-EU countries) unless specifically indicated otherwise for which you will be informed in advance and if necessary your consent will be requested. The legal basis for these treatments is the fulfillment of the services inherent to the relationship established, the respect of legal obligations and the legitimate interest of Sertorelli Sport Hotel Umbrail S. r. l. to carry out processing operations necessary for those purposes.

SECTION III

What happens if the Interested Party does not provide the data identified as necessary for the performance of the requested service? (Art. 13, 2nd paragraph, letter and GDPR)

The collection and processing of personal data is necessary to provide the services requested as well as the Service and/or the supply of the requested Product. If the interested party does not provide the personal data expressly provided for as necessary in the order form or in the registration form, the Data Controller will not be able to carry out the processing related to the management of the services requested and/or the contract and the Services/Products connected to it, nor to the fulfillments that depends on them.

What happens if the interested party does not provide consent to the processing of personal data for commercial promotion activities on Services/Products other than those purchased?

If the interested party does not give his consent to the processing of personal data for such purposes, such processing will not take place for those purposes, without this having any effect on the provision of the services requested, nor for those for which he has already given his consent, if requested. In the event that the interested party has given his consent and subsequently revokes or opposes the processing for commercial promotion activities, his data will no longer be processed for such activities, without any consequences or detrimental effects for the interested party and for the services requested.

How we process the data of the interested party (art. 32 GDPR)

The Data Controller provides for the use of appropriate security measures in order to preserve the confidentiality, integrity and availability of personal data of the Data Subject and imposes similar security measures on third party suppliers and Managers.

Where we process the data of the interested party

The personal data of the interested party are stored in paper, computer and telematic archives located in countries where the GDPR is applied (EU countries).

How long is the data of the person concerned kept? (art. 13, 2nd paragraph, letter to GDPR)

Unless he or she explicitly expresses his or her wish to remove them, the personal data of the interested party will be kept for as long as it is necessary for the legitimate purposes for which it was collected. In particular, they will be kept for the entire duration of your registration and in any case no longer than a maximum period of 12 (twelve) months of your inactivity, or if, within this period, you are not associated with the Services and/or purchased Products through the registry.

In the case of data provided to the Data Controller for commercial promotion purposes for services other than those already acquired by the Data Subject, for which he initially gave his consent, these will be kept for 24 months, unless the consent given is revoked. In the case of data provided to the Owner for profiling purposes, these will be kept for 12 months, unless the consent given is revoked. It should also be added that, in case a user forwards to Sertorelli Sport Hotel Umbrail S. r. l. personal data not requested or not necessary for the performance of the requested service or the provision of a service closely related to it, Sertorelli Sport Hotel Umbrail S. r. l. cannot be considered as the owner of these data, and will delete them as soon as possible.

Regardless of the determination of the Data Subject to their removal, personal data will in any case be stored according to the terms provided for by current legislation and/or national regulations, for the exclusive purpose of guaranteeing the specific fulfillments of certain Services (by way of example, but not limited to, Certified E-mail, Digital Signature, Replacement Storage. In any case, personal data will be kept for the fulfillment of obligations (ex. fiscal and accounting) that remain even after the termination of the contract (art. 2220 c. c.); for such purposes, the Owner will keep only the data necessary for the pursuit thereof. This is without prejudice to the cases in which the rights deriving from the contract and/or from the registration of the personal data, in which case the personal data of the interested party, exclusively those necessary for such purposes, will be processed for the time necessary to pursue them.

What are the rights of the interested party? (articles 15 - 20 GDPR)

The data subject has the right to obtain the following from the data controller:

1. confirmation as to whether or not personal data concerning him/her are being processed and, if so, to obtain access to the personal data and the following information:
 1. the purposes of the processing;
 2. the categories of personal data concerned;
 3. the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients from third countries or international organisations;
 4. where possible, the intended period of retention of personal data or, if that is not possible, the criteria used to determine that period;
 5. the existence of the right of the data subject to ask the data controller to rectify or delete personal data or to limit the processing of personal data concerning him/her or to object to its processing;
 6. the right to lodge a complaint with a supervisory authority;
 7. if the data are not collected from the data subject, all available information on their origin;
 8. the existence of an automated decision-making process, including profiling, and, at least in such cases, significant information on the logic used and the importance and expected consequences of such processing for the data subject.
 9. the appropriate safeguards provided by the third country (non-EU) or an international organisation to protect any data transferred.
2. the right to obtain a copy of the personal data undergoing processing, provided that this right does not adversely affect the rights and freedoms of others; in the event of further copies requested by the data subject, the data controller may charge a reasonable fee based on administrative costs.
3. the right to obtain from the data controller the rectification of inaccurate personal data concerning him/her without undue delay.
4. the right to obtain from the data controller the cancellation of personal data concerning him/her without unjustified delay, if the reasons provided by the GDPR in art. 17, including, for example, if they are no longer necessary for the purposes of the processing or if the

processing is unlawful, and provided that the conditions laid down by law are met; and in any case if the processing is not justified by another equally legitimate reason;

5. the right to obtain from the owner of the treatment the limitation of the treatment, in the cases provided for in the article. 18 of the GDPR, for example where you have disputed its accuracy, for the period necessary for the Holder to verify its accuracy. The interested party must also be informed, within a reasonable period of time, when the period of suspension has been completed or the cause of the limitation of treatment has ceased, and therefore the limitation itself revoked;

6. the right to obtain communication from the data controller of the recipients to whom requests for any rectification or cancellation or restriction of processing carried out have been transmitted, unless this proves impossible or involves a disproportionate effort.

7. the right to receive in a structured format, in common use and readable by automatic device the personal data concerning him/her and the right to transmit such data to another data controller without hindrance by the data controller to whom he/she has provided them, in the cases provided for by the art. 20 of the GDPR, and the right to obtain direct transmission of personal data from one data controller to another, if technically doable.

For any further information and in any case to send your request, please contact the Owner at info@sertorelli-cervinia.it. In order to ensure that the above rights are exercised by the Interested Party, and not by unauthorized third parties, the Owner may request the same to provide any further information necessary for the purpose.

How and when can the interested party object to the processing of his/her personal data? (Art. 21 GDPR)

For reasons relating to the particular situation of the interested party, the same may object at any time to the processing of their personal data if it is based on legitimate interest or if it is for commercial promotion activities, by sending the request to the Owner at info@sertorelli-cervinia.it. The interested party has the right to the deletion of his/her personal data if there is no legitimate reason prevailing over that which gave rise to the request, and in any case if the interested party has opposed the processing for commercial promotion activities.

To whom can the interested party lodge a complaint? (Art. 15 GDPR)

Without prejudice to any other action in administrative or judicial proceedings, the interested party may submit a complaint to the supervisory authority competent on Italian territory (*Autorità Garante per la protezione dei dati personali*) or to the authority that carries out its duties and exercises its powers in the Member State where the violation of the GDPR occurred. Any update of this Information Notice will be communicated promptly and by appropriate means and will also be communicated if the Data Controller processes the data of the Data Subject for purposes other than those referred to in this Information Notice before proceeding and following the expression of the relative consent of the Data Subject if necessary.

SECTION IV

COOKIE

General information, deactivation and management of cookies

Cookies are data that are sent from the website and stored by your internet browser on your computer or other device (e. g. tablet or mobile phone). Technical cookies and third party cookies may be installed from our website or its subdomains. In any case, the user can manage, or request the general deactivation or deletion of cookies, by changing the settings of their Internet browser. Such deactivation, however, may slow down or prevent access to certain parts of the site. The settings for managing or disabling cookies may vary depending on the internet browser you are using, so for more information on how to do this, we suggest that you consult your device manual or your internet browser's "Help" function.

Below we indicate to Users the links that explain how to manage or disable cookies for the most popular internet browsers:

1. Internet Explorer:
<http://windows.microsoft.com/it-IT/internet-explorer/delete-manage-cookies>
2. Google Chrome:
<https://support.google.com/chrome/answer/95647>
3. Mozilla Firefox:
<http://support.mozilla.org/it/kb/Gestione%20dei%20cookie>
4. Opera:
<http://help.opera.com/Windows/10.00/it/cookies.html>
5. Safari:
<https://support.apple.com/kb/PH19255>

Technical Cookies

The use of technical cookies, namely cookies necessary for the transmission of communications over an electronic communication network or cookies strictly necessary for the supplier to provide the service requested by the customer, allows the safe and efficient use of our site. Session cookies may be installed in order to allow access and stay in the reserved area of the portal as an authenticated user. Technical cookies are essential for the proper functioning of our website and are used to enable users to navigate normally and take advantage of the advanced services available on our website. The technical cookies used are divided into session cookies, which are stored exclusively for the duration of navigation until the browser is closed, and persistent cookies which are stored in the memory of the user's device until they expire or are deleted by the user.

Our site uses the following technical cookies:

1. Technical navigation or session cookies, used to manage normal navigation and user authentication;
2. Functional technical cookies, used to store customizations chosen by the user, such as, for example, the language;
3. Technical analytics cookies, used to learn how users use our website so that we can evaluate and improve the way it works.

Third party cookies

Third party cookies may be installed: these are Google Analytics, Google Doubleclick, Criteo, Rocket Fuel, Youtube, Yahoo, Bing and Facebook cookies. These cookies are sent by the websites of third parties external to our site.

Third party analytical cookies are used to detect information about user behavior on the site. The survey is carried out anonymously in order to monitor performance and improve the usability of the site. Third party profiling cookies are used to create user profiles in order to propose advertising messages in line with the choices made by users. The use of these cookies is governed by the rules prepared by the third parties themselves, therefore, we invite Users to read the privacy policies and instructions to manage or disable cookies published on the following web pages:

For Google Analytics cookies

1. privacy policy:
<https://www.google.com/intl/it/policies/privacy/>
2. directions to manage or disable cookies:
<https://support.google.com/accounts/answer/61416?hl=it>

For Facebook cookies:

1. privacy policy:
<https://www.facebook.com/privacy/explanation>

2. directions to manage or disable cookies:

<https://www.facebook.com/help/cookies/>

For Youtube cookies

1. privacy policy:

<https://www.youtube.com/intl/it/yt/about/policies/#community-guidelines>

2. directions to manage or disable cookies:

<https://support.google.com/accounts/answer/61416?hl=it>

For Yahoo cookies:

1. privacy policy and directions to manage or disable cookies:

<https://policies.yahoo.com/ie/it/yahoo/privacy/eu oathnoticefaq/>

For Bing's cookies:

1. privacy policy and directions to manage or disable cookies

<https://privacy.microsoft.com/it-it/privacystatement>

Profiling cookies

They can be installed by the Owner(s), using so-called software. web analytics, profiling cookies, which are used to set up detailed and real-time analysis reports on: website visitors, search engines of origin, keywords used, language of use, most visited pages. They may collect information and data such as IP address, nationality, city, date/time, device, browser, operating system, screen resolution, navigation origin, pages visited and number of pages, length of visit, number of visits made. Such data may be transferred to each of the Companies of the Group, in compliance with and within the limits imposed by current legislation and by the provisions of this Information Notice.

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Sede Legale: Località Grand Chemin, 30

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