

Privacy Policy - Cierre S.r.l.

Last update: 07/02/2022 - 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, Cierre S.r.l. intends to inform each user (the “**User**”) about the processing of personal data happening on its website www.hoteldrago.com (the “**Website**”).

Controller and Contact details

Cierre S.r.l. (hereinafter “**Controller**”, pursuant to art. 4(7) GDPR) with registered offices in Via Zanini, 91 - 25010 Vesio di Tremosine (BS)

Contact details: info@hoteldrago.com

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 requests and accommodation.	✓ Anagraphic information (Name and surname, address) ✓ 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 gift cards and manage the purchasing of these cards.	✓ Anagraphic information (Name and surname) ✓ Financial details (credit card number) ✓ Contact details (phone number, email)	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.

	of the User and the receiver)		
C) Respond to information requests.	<ul style="list-style-type: none"> ✓ Anagraphic information (Name and surname) ✓ Contact details (email, phone number) 	Consent [Art. 6, 1, lett. a) GDPR]	For the period of time necessary to answer the User.
D) Send materials for marketing purposes (by mail, SMS or email).	<ul style="list-style-type: none"> ✓ 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.
E) Allow the Controller to accomplish all formalities required by law.	<ul style="list-style-type: none"> ✓ Anagraphic information (Name and surname, 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.
F) 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).
G) 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 User's computer. ✓ URI Address (Uniform 	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years.

	Resource Identifier) of booking request and the time of the request.		
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The processing of Personal Data referred to in points (A) and (B) 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 or with the gift card Receiver. Any refusal makes it impossible for the Controller to fulfil that purpose.

The processing of Personal Data referred to in points (C) and (D) is voluntary. The absence of User’s consent shall have no impact on the completion of the contract.

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.

Data sharing

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 booking service, whose privacy policy is available at the following [link](#)); ii) consultants and other third-party service providers who perform services for the Controller 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 Data Controller at info@hoteldrago.com.

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

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 the 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.

Data subject's rights

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

Specifically, the User can:

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

Complaints

The User is always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation when the processing of Personal Data made by the Data Controller is considered unlawful by the User.

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.