PRIVACY POLICY

Villino collinamare® is committed to protecting your privacy and ensuring transparency regarding the use of your personal data.
This Privacy Policy describes how we process users' personal data collected directly while browsing the website www.villino-collinamare.it and any other websites operated by Villino collinamare®, regardless of domain name (collectively, the "Site").

We inform you that Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR) and Legislative Decree No. 101 of August 10, 2018, set out rules on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. These rules are designed to safeguard individuals' rights and freedoms, especially the right to the protection of personal data.
Under the GDPR, "personal data" refers to any information relating to an identified or identifiable natural person, particularly data such as a name, identification number, location data, online identifier, or other identifiers relating to physical, physiological, genetic, mental, economic, cultural, or social identity.

This document also outlines how the Site is managed concerning the processing of users' personal data.

The version of the Privacy Policy currently published on the Site is the one in effect. We reserve the right to update this policy in line with changes in legislation or internal practices. We encourage users to review the Privacy Policy regularly.

1. THE DATA CONTROLLER

The Data Controller is:
Nicola C. Costantini
Contrada Sant' Andrea, 59/A
63064 Cupra Marittima (AP)
privacy[AT]villino-collinamare.it

2. TYPES OF DATA COLLECTED, PURPOSES, AND LEGAL BASES FOR PROCESSING

We collect and process the following types of personal data through our website:

- Personal identification and contact details (e.g., address, phone numbers, fax, email)

- Family-related information
- Payment and billing information

This data is voluntarily provided by the user and may be collected electronically or via telecommunication tools. It is processed for the purpose of managing short-term rentals for tourism purposes, specifically:

a) To fulfill service or information requests, including the potential disclosure of data to third parties when necessary to meet such requests.
b) To manage relationships during pre-contractual and contractual stages, and for the drafting of contracts.
c) For accounting, administrative, and tax purposes, as required by applicable laws and regulations.

Providing data for point (c) is mandatory to comply with legal obligations. Data provision under points (a) and (b) is optional, but failure to provide it may prevent us from fulfilling a user's request or finalizing a contract.

3. LEGAL BASIS FOR PROCESSING

Processing is lawful when one of the following conditions applies:

I. The User has provided explicit consent;
II. The processing is necessary for contract performance or pre-contractual measures;
III. The processing is required to comply with legal obligations;
IV. It is necessary for a public interest task or exercise of official authority;
V. It is based on the legitimate interests of the Controller or third parties.

Users can always request clarification regarding the legal basis for specific data processing activities.

4. METHODS, LOCATION OF DATA PROCESSING AND DATA RETENTION PERIODS

● Processing Method

The Controller adopts appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of Personal Data.
Data is processed manually or through IT and/or telematic and/or paper-based tools, using organizational methods and logic strictly related to the stated purposes. Paper and electronic documentation will be properly maintained and protected for the duration necessary to carry out the processing, using appropriate security measures to minimize risks of destruction, loss, unauthorized access, or processing inconsistent with the purposes of collection.

This website **does not use cookies** to collect personal data or track user behavior. No profiling, preference analysis, or tracking of visits is carried out for advertising or statistical purposes.
The only collection of personal data occurs exclusively through any contact forms present on the site, in line with the stated purposes and without the use of tracking tools.
For any information or clarification, the user can contact us at the references provided in the **Contact** section of this Privacy Policy.

● Links to External Sites
The Site may contain links to third-party services, e.g., Google Maps, Facebook, Instagram, LinkedIn, YouTube, or other services. These platforms may use their own cookies and data processing practices.
We do not control or take responsibility for how third parties process personal data. Users should refer to their respective privacy policies.

For more information, you can visit the following pages:

- **Google Maps** – Privacy
- **Facebook** – Privacy
- **LinkedIn** – Privacy Policy
- **YouTube** – Privacy

If you would like more information on how to protect your privacy while browsing, you can consult your browser settings to manage cookie preferences.

In addition to the Controller, in some cases, other parties involved in the organization of this Website (administrative, commercial, marketing, legal, system administrators), as well as external parties (such as third-party technical service providers, hosting providers, IT companies, communication agencies), may have access to the Data. These parties may also be appointed, if necessary, as Data Processors by the Controller.

The updated list of Data Processors can always be requested from the Controller.

The IT systems and software procedures used to operate this website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes IP addresses (used to verify the reliability of the User and for security purposes), domain names of the computers used by users connecting to the site, URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numeric code indicating the status of the server's response (successful, error, etc.), and other

parameters related to the user's operating system and IT environment. These data are used solely for investigating responsibility in case of hypothetical cybercrimes against the site, except for this possibility.

● Location of processing
Data is processed at the Controller's operational headquarters and in locations where the parties involved in data processing operate. For further information, please contact the Data Controller.
Personal data may be transferred to countries other than the user's residence.

● Retention Period
Data is retained only for as long as necessary to fulfill the purposes for which it was collected, or as required by law, such as:

1. The duration of the contractual relationship;
2. Legal obligations, especially tax-related;
3. Protection or enforcement of the Controller's rights;
4. Applicable statutory limitation periods.

As a rule, personal data will be retained for the entire duration of the contractual relationship and for a period of ten (10) years after its termination.
Longer retention is permissible if required for a legitimate purpose, e.g. the judicial defense of the rights of Villino collinamare®. In such a case, the data will be retained only for as long as necessary to achieve that purpose.

5. WHAT KINDS OF MEASURES ARE APPLIED TO GUARANTEE THE SECURITY OF THE USER'S PERSONAL DATA?

Data submitted via contact forms is encrypted via SSL and stored on secure servers. Access to this data is restricted to authorized personnel.

Does the Site contain elements or links controlled by third parties?
Yes, the Site may contain elements and links managed by third parties. Currently, a Google Maps map is embedded via an iframe in the "Map & Contacts" section. In the future, video content may also be embedded through the YouTube platform. These third-party elements are integrated without the Controller collecting or processing users' personal data, such as location information.

Parties authorized to process data, data processors and data disclosure
The data collected, insofar as it is relevant for the purposes of the processing and where necessary or instrumental to those purposes, may be processed by third parties as external Data Processors appointed under Article 28 of the GDPR.

Alternatively, data may be disclosed to third parties to comply with or enforce specific legal, regulatory, or EU obligations for the purposes set out in point 2.

Under no circumstances and for no reason will your data be disseminated. Villino collinamare® does not use a Data Protection Officer (DPO).

6. DATA SUBJECT RIGHTS

User Rights under the General Data Protection Regulation (GDPR)
Users may exercise certain rights with respect to their Data processed by the Controller.

In particular, within the limits set by law, the User has the right to:

- ✔ **Withdraw consent at any time.**
  The User can withdraw previously given consent to the processing of their Personal Data.
- ✔ **Object to data processing.**
  The User can object to the processing of their Data if it is carried out on a legal basis other than consent.
- ✔ **Access their Data.**
  The User has the right to obtain information about the Data processed by the Controller, about certain aspects of the processing, and to receive a copy of the processed Data.
- ✔ **Verify and request rectification.**
  The User can verify the accuracy of their Data and request its update or correction.
- ✔ **Obtain restriction of processing.**
  The User may request the restriction of the processing of their Data. In such a case, the Controller will not process the Data for any purpose other than storage.
- ✔ **Obtain erasure or deletion of their Personal Data.**
  The User may request the deletion of their Data by the Controller.
- ✔ **Receive their Data or have it transmitted to another controller.**
  The User has the right to receive their Data in a structured, commonly used, and machine-readable format and, where technically feasible, to have it transmitted without hindrance to another controller.
- ✔ **Lodge a complaint.**
  The User can lodge a complaint with the competent data protection authority or take legal action.

Users have the right to obtain information regarding the legal basis for the transfer of Data abroad, including to any international organization governed by

international law or constituted by two or more countries, such as the UN, as well as regarding the security measures adopted by the Controller to protect their Data. To exercise these rights, the User can contact us at any time at the following address:
privacy[AT]villino-collinamare.it

If there is any doubt about the User's identity when a rights request is made, a supporting identification document may be requested.

7. HOW TO EXPRESS YOUR PREFERENCES REGARDING THE USE OF YOUR PERSONAL DATA

Users may withdraw consent for processing at any time, where such processing is based on consent, by contacting us at the following address:
privacy[AT]villino-collinamare.it
Withdrawal of consent does not affect the lawfulness of prior processing based on consent.

8. WHO TO CONTACT IF YOU BELIEVE VILLINO COLLINAMARE® IS NOT MEETING ITS OBLIGATIONS

If, after contacting our Controller, you believe that Villino collinamare® is not fulfilling its obligations under the applicable data protection laws and regulations — particularly regarding data security or the exercise of your rights — you may file a complaint with your local supervisory authority. **(For Italy: https://www.garanteprivacy.it/home/diritti/come-agire-per-tutelare-i-tuoi-dati-personali)**

9. DEFINITIONS AND LEGAL REFERENCES

Personal Data (or Data)
Any information that, directly or indirectly, alone or in combination with other data (such as an identification number), allows the identification of a natural person.

Usage Data
Even without cookies, while browsing this Website certain technical information is automatically collected, necessary for the correct functioning and security of the system. This information may include: IP addresses or domain names of the devices used by users, URI (Uniform Resource Identifier) addresses, time of request, method used to send the request to the server, size of the returned file, numeric code indicating the status of the server's response (success, error, etc.),

country of origin, browser and operating system characteristics, visit duration (e.g., session time on each page), and the navigation path followed within the Site.

This data is processed in aggregated and anonymized form for security, statistical, and monitoring purposes and does not directly identify the user.

User
The individual using this Website. Unless otherwise specified, the User is the Data Subject.

Data Subject
The natural person to whom the Personal Data refers.

Data Processor (or Processor)
A natural or legal person, public authority, agency, or other body that processes Personal Data on behalf of the Data Controller, as described in this Privacy Policy.

Data Controller (or Controller)
The natural or legal person, public authority, agency, or other body that, alone or jointly with others, determines the purposes and means of processing Personal Data, including security measures relating to the operation and use of this Website. Unless otherwise specified, the Data Controller is the owner of this Website.

This Website (or this Application)
The digital platform (hardware or software) through which Users' Personal Data is collected and processed.

Service
The Service provided by this Website as defined in the relevant terms (if present) on this site/application.

European Union (or EU)
Unless otherwise stated, references to the European Union include all current member states of the EU and the European Economic Area (EEA).

Cookies
Small text files stored in the User's browser that serve tracking, functionality, or preference purposes.

Legal References
Unless otherwise specified, this Privacy Policy applies solely to this Website and complies with.

Footnote: * In email addresses, replace "[AT]" with "@".