# Bommartini Milly – Appartaments Gardastivo and Al Fontanon

## PRIVACY
## Privacy policy on the processing of personal data
## (Art. 13 Community regulation GDPR 2016/679)

This document describes the management arrangements referring to the processing of personal data of users who benefit from the services provided by the company on behalf of the Contractor. The present policy is also made available under the EU REGULATION 2016/679 OF THE EUROPEAN PARLIAMENT AND COUNCIL dated April 27th, 2016, fully operational from the date of 25th May 2018, subsequently Law n. 101/2018.

### THE CONTROLLER
Following the customer's intentions to join one of the services offered by the company, all data relating to identified or identifiable people can be processed. The Controller is represented by the *Bommartini Milly – appartamenti GardaStivo e Al Fontanon*, with its registered seat in *Street Calvario 4, 38062 Arco (TN) Italy* and Operational headquarters (referring to the location of the apartments) in Via Soccesure, 1 38062 Arco (TN) and go Stranfora 27 38062 Arco (TN), info@appartamentigardastivo.com.

### THE RESPONSIBILITY FOR PROCESSING
The Controller responsible for processing is Bommartini Milly, *info@appartamentigardastivo.com* who has been entrusted with the task of controlling the services stated in the contract with the Contractor through his in-house divisions and summarised below:
- Request for information by the data subject;
- Booking of services;
- Quotation for services to provide;
- Provision of services;
- **Hygienic-sanitary control activities foreseen by the regulatory protocols for containment measures in the tourism sector;**
- Complaint;
- Public service announcement; **also for the sanitary hygiene standards**.
- Activities related to the management of company's suppliers;
- Activities related to the management of company's Human Resources;

### LOCATION OF DATA PROCESSING
Service-related processing shall take place at the above-mentioned Contractor's premises and shall only be carried out by technical staff from the Office responsible for processing. In case of need, data connected to the service can be processed by the company's staff through the use of a management software (responsible for the processing in accordance with article 29 of the Code on the protection of personal data), at the premises of the company concerned.

### TYPES OF DATA PROCESSED
*Data provided voluntarily by the user*
The transmission, communication and/or the optional, explicit and voluntary submission of contents by electronic mail to the e-mail addresses indicated by the company (also www.appartamentigardastivo.com) means the later acquisition of the sender's address and the user data for answering enquiries.

### OPTIONAL PROVIDING OF DATA
The customer can freely provide personal data, after being informed by the staff concerned with the collection that without those data the services can't be deployed and the failure in providing them could prevent the customer from getting what had been requested.

**MODALITIES OF DATA PROCESSING**
Personal data are processed by using automated tools for as long as is strictly necessary to achieve the purposes for which they were collected.
Specific safety measures are observed to prevent the loss of data, improper or incorrect uses and unauthorised accesses.

**DATA PROCESSING DURATION**
By the time the provision of the service is concluded or for as long as necessary to carry out the above-mentioned objectives, personal data will be kept for the sole historical and statistical purposes, in accordance with the law, the regulations, the Community legislation and ethical codes of conduct under article 40 of EU Reg. 2016/679.
**Following this principle, Your personal data will be processed by the Controller and limited to what is necessary to achieve the purposes contained in this policy.** In particular, your personal data will be in particular processed for a time equal to the minimum time required, as outlined in the Recital 39 of the Regulation, namely until the end of contractual relations between You and the Controller, without prejudice to a further period, imposed by legal provisions, as stated in the Recital 65 of the Regulation. Beyond such period, all personal data will be kept on an anonymous basis, or they will be destroyed.

**RIGHTS OF DATA SUBJECTS**
Data subjects whose personal data refer to have the right at any moment to know whether or not these data exist and their content and origin, to verify the accuracy or ask for a supplementing, updating or correction. According to the same article, a data subject has the right to request the deletion, transformation on an anonymous basis or the blocking of data processed by violating the law, and to object, in any case and for legitimate reasons, to their processing.

**RIGHT TO DATA PORTABILITY**
At any moment the data subject shall request and receive, in accordance with article 20, paragraph 1 of the Regulation, all the Personal Data processed by the Controller and/or Joint Controller in a structured, commonly used and readable format or ask for the unimpeded transmission to another controller. In this case the subject will arrange to provide us all references of the new controller to whom the transfer of Personal Data is addressed, together with a prior written approval.

**RIGHT OF WITHDRAWAL AND CONSENT**
If the processing is based on consent, the controller will inform the data subject of the right of withdrawing it at any moment, without prejudice to the lawfulness of the processing based on consent given before the withdrawal.

**RIGHT TO LODGE A COMPLAINT**
The Controller informs the data subject of the right to lodge a complaint to a supervisory authority in Rome
https://www.garanteprivacy.it/home.en
The *Bommartini Milly – appartamenti Gardastivo and Al Fontanon* gives you the opportunity to exercise these rights by writing at:

*info@appartamentigardastivo.com* or by mailing to the *Street Calvario 4, 380662 Arco (TN) Italy*