PRIVACY POLICY

The purpose of this document is to inform the natural person (hereinafter "Interested") about the processing of his data personal data (hereinafter "Personal Data") collected by the data controller, Lisa Gemignani, Via corte pagnini 6, 55049 Viareggio, Code

Fiscale GMGLSI72T63L833D, VAT number 02535970467, e-mail address ellengranucci@gmail.com, PEC address lisagemignani@pec.it,

telephone 3208917304, (hereinafter the "Owner"), through the website casasottolatorre.it (hereinafter the "Application"). Modifications and updates will be binding as soon as they are published on the Application. In case of non-acceptance of the the ways you make to the Privacy Policy, the interested party is required to cease using this Application and may request the Owner to delete their Personal Data.

1. Categories of Personal Data processed

The Data Controller processes the following types of Personal Data provided voluntarily by the Data Subject:

- **Contact details**: name, surname, address, e-mail, telephone, images, authentication credentials, any additional ones information sent by the interested party, etc.
- o Tax and payment data: tax code, VAT number, credit card details, bank account details, etc.

The Data Controller processes the following types of Personal Data collected in an automated manner:

• **Data relating to the exact location of the interested party:** for example, geolocation data that accurately identifies the position of the interested party that can be collected via the satellite network (eg GPS) and other means, collected with prior consent of the interested party. The interested party can revoke the consent at any time.

Failure by the Data Subject to provide Personal Data for which there is a legal, contractual obligation or if constitute a necessary requirement for the conclusion of the contract with the Owner, will make it impossible for the Owner to establish or continue the relationship with the interested party.

The interested party who communicates the Personal Data of third parties to the Data Controller is directly and exclusively responsible for them origin, collection, treatment, communication or dissemination.

2. Cookies and similar technologies

The Application uses cookies, web beacons, unique identifiers and other similar technologies to collect Personal Data of the interested party on the pages, on the links visited and on the other actions that are performed when the interested party uses the Application.

They are stored to be then transmitted to the next visit of the interested party. You can view the Cookie Complete policy at the following address:

3. Legal basis and purpose of the processing

The processing of Personal Data is necessary:

- a) for the execution of the contract with the interested party and precisely:
 - fulfilment of any obligation arising from the pre-contractual or contractual relationship with the interested part
 - support and contact with the interested party: to respond to the requests of the interested party
- b) by law and precisely:
- the fulfillment of any obligation required by current regulations, laws and regulations, in particular, on the subject tax and fiscal
- c) on the basis of the legitimate interest of the Data Controller, for:
- statistics with anonymous data: to carry out statistical analyzes on aggregate and anonymous data to analyze behavior of the interested party, to improve the products and / or services provided by the Data Controller and better meet the expectations of the interested party

Based on the legitimate interest of the Owner, the Application allows you to carry out interactions with external or social platforms network whose processing of Personal Data is governed by the respective privacy policies to which please refer. The interactions and the information acquired by this Application are in any case subject to the privacy settings that the interested party has chosen on such platforms or social networks. This information - in the absence of a specific consent to the processing for additional purposes - are used only to allow the use of the Application and provide information and services required.

The Personal Data of the interested party may also be used by the Data Controller to protect themselves in court before the judicial offices competent.

4. Methods of processing and recipients of Personal Data

The processing of Personal Data is carried out using paper and IT tools with organizational methods and with logic strictly related to the purposes indicated and through the adoption of adequate security measures.

Personal Data are processed exclusively by:

- people authorized by the Data Controller of Personal Data who are committed to confidentiality or have a adequate legal obligation of confidentiality;
- subjects who operate independently as separate data controllers or by subjects designated as managers of the processing by the Data Controller in order to carry out all the processing activities necessary to pursue the purposes referred to herein information (for example, business partners, consultants, IT companies, service providers, hosting providers);
- o subjects or entities to which it is mandatory to communicate Personal Data by law or by order of the authorities.

The subjects listed above are required to use appropriate safeguards to protect Personal Data and can only access those necessary to perform the tasks assigned to them.

Personal Data will not be disclosed indiscriminately in any way.

5. Place

If necessary, the Personal Data could be transferred to subjects located outside the territory of the Economic Area European (EEA). Whenever Personal Data should be transferred outside the EEA, the Data Controller will adopt any contractual measure suitable and necessary to guarantee an adequate level of protection of Personal Data, including - among others - agreements based on standard contractual clauses for data transfers outside the EEA approved by the Commission European. To request information on the specific guarantees adopted, the interested party can contact the Data Controller at the following address email ellengranucci@gmail.com.

6. Retention period of Personal Data

Personal Data will be kept for the period of time necessary to fulfil the purposes for which they were collected, in particular:

- for purposes relating to the execution of the contract between the Owner and the Data Subject, they will be kept for the entire duration of the relationship contractual and, after termination, for the ordinary prescription period of 10 years. In the case of judicial litigation, for the entire duration of the same, until the terms of enforceability of the appeals are exhausted
- o for purposes related to the legitimate interest of the Data Controller, they will be kept until the fulfillment of this interest
- for the fulfilment of a legal obligation, by order of an authority and for legal protection, will be kept in compliance the timescales envisaged by said obligations, regulations and in any case until the prescribed limitation period is fulfilled by the regulations in force
- o for purposes based on the consent of the interested party, they will be kept until the consent is revoked

At the end of the retention period, all Personal Data will be deleted or stored in a form that does not allow the identification of the interested party.

7. Rights of the interested party

Interested parties may exercise certain rights with reference to the Personal Data processed by the Data Controller. In particular, the interested party has the right to:

- o be informed about the processing of their Personal Data
- withdraw consent at any time
- o limit the processing of your Personal Data
- \circ oppose the processing of their Personal Data
- o access your Personal Data
- $\circ \quad$ verify and request the rectification of their Personal Data
- o obtain the limitation of the processing of their Personal Data

- o obtain the cancellation of their Personal Data
- o transfer your Personal Data to another holder
- lodge a complaint with the supervisory authority for the protection of your Personal Data and / or take legal action.

To exercise their rights, the interested parties can send a request to the following e-mail address ellengranucci@gmail.com. Requests will be taken over by the Owner immediately and processed as soon as possible, in any case within 30 days.

Last updated: 06/29/2022