Villa Crespi

Privacy Policy

The protection of the privacy of Users of our website is an absolute priority for us.

Pursuant to Articles 13 and 14 of EU Regulation 2016/679 (the "GDPR" – General Data Protection Regulation), ANTONINO S.R.L. wishes to provide Users, pursuant to Article 13 of EU Regulation 2016/679 (hereinafter the "GDPR" or the "Regulation") and Legislative Decree 196/2003 (the Italian Privacy Code), as amended by Legislative Decree 101/2018 and subsequent amendments and supplements, with information concerning the purposes and methods of processing personal data (hereinafter, the "Data") of Users who visit the following website: www.cannavacciuolobistrot.it

NB: This privacy notice is provided solely in relation to the above-mentioned websites and does not apply to any other websites that Users may access through links.

By connecting to the website and, where applicable, providing their personal data or giving consent to the processing thereof (when required for specific purposes), the User declares that they are over 16 years of age.

Where the service is used by minors, or where personal data relating to minors are provided in connection with hotel or restaurant booking requests, such data shall be processed exclusively to the extent necessary for managing the booking, providing the requested service and complying with any applicable legal obligations. In such cases, the minor's data must be provided by a person exercising parental responsibility or by another duly authorised person, who warrants that they are authorised to communicate such data to the Data Controller.

A) PARTIES INVOLVED IN THE PROCESSING OF PERSONAL DATA

The **Data Controller** is **ANTONINO S.R.L.**, Tax Code **VAT No. IT02587680030, with registered office at VIALE MARAZZA 4 – 28021 BORGOMANERO (NO), Italy, Tel.: +39 0322 81968, PEC: antoninocsrl@legalmail.it**

Studio Bagaini e Rillo, Viale Marazza 4, 28021 Borgomanero (NO), VAT No. 01699250039, and **New Sistem S.r.l.**, Viale Marazza 4, 28021 Borgomanero (NO), VAT No. 01622410031, represented by Accountant Maria Silvana Rillo, Tax Code RLLMSL61C46H632Y, have been appointed by the Data Controller as **Data Protection Officer (DPO)** for CA.PRI S.R.L.

Joint Data Controller: Cannavacciuolo Consulting S.r.l. Unipersonale, with registered office at Viale Marazza 4, 28021 Borgomanero (NO), Italy, PEC: . cannavacciuoloconsultingsrl@legalmail.it

The complete and updated list of Data Processors is available at the registered office of the Data Controller.

For information and to exercise their rights, data subjects may also contact: privacy@cannavacciuologroup.it

B) PERSONAL DATA SUBJECT TO PROCESSING

Through our website, the Data Controller (as well as any Data Processors) may collect and process the following personal data relating to Users:

Common personal data of the User, suitable for allowing their identification and the conclusion of any contracts concerning requested services/products, including: first and last name, email address, telephone number, tax information (where an invoice is required), further identification data whose transmission to the competent Police Headquarters is mandatory pursuant to Article 109 of Royal Decree No. 773/1931 (Consolidated Law on Public Security) and Article 2 of the Technical Annex to Ministerial Decree No. 076.01.2013, as well as any additional personal data voluntarily provided by the User for assistance and information purposes.

Information relating to credit cards or other payment instruments used by the User to make payments shall not be processed directly by the Data Controller, but by the authorised payment service provider, through specific and secure protocols. For further information regarding the processing of such data, Users are invited to consult the privacy policy of the selected payment service provider.

For booking purposes, special categories of personal data may be collected, including health-related data concerning allergies or food intolerances, as well as additional data relating to particular dietary requirements followed by the User.

C) PURPOSES, LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF PROCESSING

The purposes for which the Data Controller processes the data referred to above are as follows:

1. Management of restaurant booking requests;
2. Management of hotel booking requests;
3. Compliance with obligations imposed by applicable law (accounting, tax, etc.);
4. Compliance with obligations imposed by applicable legislation concerning the identification of guests staying at accommodation facilities and the reporting of their details to the territorially competent Police Headquarters pursuant to Article 109 of Royal Decree No. 773/1931 (Consolidated Law on Public Security) and the legislation referred to therein;
5.
6. Management of requests for assistance or information submitted by Users by email, telephone or other contact channels made available by the Data Controller;
7. Sending newsletters containing commercial offers relating to the activities of the Data Controller;
8. Management of website statistics based on non-anonymised data.

The legal bases for the processing of personal data in connection with the above purposes are as follows.

For the purposes referred to in Nos. 1 and 2, the legal basis is the performance of a contract to which the User is a party or the implementation of pre-contractual measures taken at the User's request, pursuant to Article 6(1)(b) GDPR. For the same purposes, where special categories of data relating to health are processed, such as allergies, food intolerances or particular dietary requirements, the legal basis is the User's freely given, specific, informed and unambiguous consent, pursuant to Article 6(1)(a) GDPR and Article 9(2)(a) GDPR.

For the purposes referred to in Nos. 3 and 4, the legal basis is compliance with a legal obligation to which the Data Controller is subject under applicable legislation, pursuant to Article 6(1)(c) GDPR.

For the purpose referred to in No. 5, the legal basis is the implementation of pre-contractual measures taken at the User's request or, depending on the content of the request, the legitimate interest of the Data Controller in responding to requests for assistance or information received, pursuant to Article 6(1)(b) and (f) GDPR.

For the purposes referred to in Nos. 6 and 7, the legal basis is the User's freely given, specific, informed and unambiguous consent, pursuant to Article 6(1)(a) GDPR. With particular reference to the sending of newsletters and marketing communications, consent is optional, separate and distinct from the other processing purposes and may be withdrawn at any time, without affecting the lawfulness of processing carried out prior to withdrawal.

For the purposes referred to in Nos. 1 and 2, the User is contractually required to provide the relevant data. In the absence of such data, the Data Controller will not be able to enter into or perform the contract with the User or provide the requested service.

For the purposes referred to in Nos. 3 and 4, the User is legally required to provide the relevant data. In the absence of such data, the Data Controller will not be able to comply with its legal obligations and the User will not be able to benefit from the requested service.

For the purpose referred to in No. 5, providing the data is optional. However, if the necessary data are not provided, the Data Controller may be unable to respond to the User's request for assistance or information.

For the purposes referred to in Nos. 6 and 7, providing the data is optional. Depending on the purpose concerned, failure to provide the data will mean that the User will not receive newsletters and the Data Controller will not be able to collect statistics based on non-anonymised data.

D) RECIPIENTS

The data processed through this website, and exclusively for the purposes indicated above, may be disclosed to parties external to the Data Controller (external consultants, suppliers, etc.) appointed as Data Processors.

For the purpose referred to in No. 4, the data may also be disclosed to the entities identified by applicable legislation, including the territorially competent Police Headquarters and the Ministry of the Interior – Department of Public Security.

E) DATA TRANSFERS

No transfers of data will be made to third countries that do not comply with the conditions set out in Articles 45 et seq., and in particular Article 46, of the GDPR.

F) DATA RETENTION

Personal data collected or otherwise processed through this website shall be processed in accordance with the principles set out in Article 5 GDPR — lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality; and accountability — using paper-based and/or electronic methods, exclusively for the purposes indicated above.

Personal data shall be retained for no longer than is strictly necessary to achieve the purposes indicated, unless further retention is required by applicable law or permitted on the basis of the Data Controller's legitimate interest or for established legal reasons.

In particular, for the purposes referred to in Nos. 1 and 2, data shall be retained for the period necessary to perform the contract and, on the basis of the Data Controller's legitimate interest in potentially defending its rights in legal proceedings, until the expiry of the applicable limitation periods for any claims arising from the contract.

For the purposes referred to in Nos. 3 and 4, data shall be retained for the period required by applicable law. For example, accounting records, invoices, letters and telegrams received and sent must be retained for 10 years pursuant to Article 2220 of the Italian Civil Code.

For the purpose referred to in No. 5, data shall be retained for the time necessary to manage and respond to the request for assistance or information and, where necessary, for any additional period permitted by applicable law to protect the rights of the Data Controller.

For the purposes referred to in Nos. 6 and 7, data shall be retained until the relevant purpose has been fulfilled or, if earlier, until the User withdraws their consent.

Once the retention period has expired, personal data shall be deleted or irreversibly anonymised in such a way as to prevent any re-identification of the User.

The IT systems used to manage the collected data are designed from the outset to minimise the use of data where such data are not strictly necessary to achieve the specific purpose pursued.

G) YOUR RIGHTS

The Data Controller informs Users of the rights granted to them under Articles 13(2)(b) and (d), 15, 16, 17, 18, 19 and 21 GDPR, namely:

- the right of access to personal data (Article 15 GDPR);
- the right to rectification (Article 16 GDPR);
- the right to erasure (Article 17 GDPR);
- the right to restriction of processing (Article 18 GDPR);
- the right to data portability (Article 20 GDPR);
- the right to object to processing (Article 21 GDPR);
- the right to withdraw, at any time, any consent previously given (Article 13(2)(c) GDPR).

Requests may be addressed to the "PARTIES INVOLVED IN THE PROCESSING OF PERSONAL DATA" by sending a registered letter with acknowledgement of receipt to the registered office of the Data Controller (or to the Joint Data Controller or DPO), or by email to: privacy@cannavacciuologroup.it