

## **Information pursuant to art. 13 and 14 of EU Regulation 2016/679**

This page represents the "Privacy Policy" of this site and has the purpose of providing information on how the personal data of users who interact with this website, who use the services rendered by it to users, are processed, as well as to provide the information required by art. 13 and 14 of EU Regulation 2016/679.

This information is provided only for this site and not for other websites that may be consulted by the user via links on the web pages of this site.

Regulation (EU) 2016/679 on the protection of personal data (hereinafter, the "Regulation") establishes rules relating to the protection of natural persons with regard to the processing of personal data, as well as rules relating to the free movement of such data and protects the fundamental rights and freedoms of natural persons, with particular reference to the right to protection of personal data.

The art. 4, no. 1 of the Regulation provides that "Personal Data" means any information relating to an identified or identifiable natural person (hereinafter, "Data subject").

"Processing" must instead mean any operation or set of operations, carried out with or without the aid of automated processes and applied to Personal Data or sets of Personal Data, such as the collection, recording, organisation, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction (art. 4, n. 2 of the Regulation).

Pursuant to the articles. 12 et seq. of the Regulation, it is also envisaged that the data subject must be made aware of the appropriate information relating to the processing activities carried out by the joint data controllers and the rights of the data subjects.

### **Joint data controllers**

Madonna di Campiglio Azienda per il Turismo S.p.A.

Via Pradalago 4

38086 – Madonna di Campiglio (TN)

Tel.: +39 0465 447501

Mail: [info@campigliodolomiti.it](mailto:info@campigliodolomiti.it)

P.IVA 01854660220

Contact details of the Data Protection Officer: [dpo@campigliodolomiti.it](mailto:dpo@campigliodolomiti.it)

Comitato 3 Tre

Via Pradalago, 4 - 38086 Madonna di Campiglio TN

P.IVA 02043920228

tel. +39046544072

Mail: [info@3trecompiglio.it](mailto:info@3trecompiglio.it)

An internal agreement has been concluded between the aforementioned joint data controllers which outlines their respective responsibilities, pursuant to art. 26 of the GDPR.

### **Purpose of the processing and legal bases of the processing**

The user's personal data will be processed for the pursuit of the following purposes and with the legal bases indicated below:

1. respond to requests sent by the user via email and/or form on the site relating to the event; the legal basis for the listed data processings is represented by the art. 6 par. 1 letter b) of EU Regulation 2016/679;
2. send emails and/or newsletters and communications relating to the services and activities offered and promoted by the joint controllers, of the same type previously used by the data subject, unless the data subject refuses to process, which may be objected to at any time; the legal basis for this type of processing is represented by the legitimate interest of the joint controllers as provided for in art.6 par. 1 letter f) of the GDPR;
3. periodically send, via remote communication technologies (email, telephone, SMS, WhatsApp), newsletters and communications on the services, products and activities offered by the joint owners; carry out market research to develop and improve our range of products, services and activities; the legal basis is represented by consent as provided for by the art. 6 par. 1 letter a) of EU Regulation 2016/679;
4. periodically send, via remote communication technologies (email, telephone, SMS, WhatsApp), newsletters and communications on the services, products and activities offered by the partners and sponsors of the joint owners, which we believe may be of interest to you; the legal basis is represented by consent as provided for by the art. 6 par. 1 letter a) of EU Regulation 2016/679;
5. establish, exercise or defend a right in court; the legal basis for this type of processing is represented by the legitimate interest of the joint controllers as provided for in art.6 par. 1 letter f) of EU Regulation 2016/679;
6. to fulfill the obligations established by law, by a regulation, by community legislation or by an order from the Authority; the legal basis for this type of processing is represented by the legitimate interest of the joint controllers as provided for in art.6 par.1 letter. c) of EU Regulation 2016/679.
7. analysis of statistical data on aggregate or anonymous data, with the aim of monitoring the correct functioning of the Site, traffic, usability and interest; the legal basis for this type of processing is represented by the legitimate interest of the joint controllers as provided for in art.6 par. 1 letter f).

### **Data types**

The data necessary for the pursuit of the purposes set out above will be collected and processed:

- identification data
- contact details
- data relating to the contractual relationship
- navigation data
- data relating to requests sent by the data subject

## **Browsing data**

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

This is information that is not collected to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users who connect to the site, the addresses in URI (Uniform Resource Identifier) notation of the requested resources, the time of the request, the method used in submitting the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the operating system and the user's IT environment.

These data are used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check its correct functioning and are deleted immediately after processing.

The data could be used to ascertain responsibility in case of hypothetical computer crimes against the site.

## **Refusal to provide data**

Apart from what is specified for navigation data, users/visitors are free to provide their personal data. The provision of data is in some cases necessary because any refusal to provide it could lead to the failure to conclude or incorrect fulfillment of the contract of which the data subject is a party and/or failure to comply with the legal obligations to which the joint data controllers are subject.

The provision of data for processing that requires consent is optional, failure to provide it will not make it impossible to use the products/services offered by the joint controllers. Even in the case of consent, the data subject will still have the right to subsequently object, in whole or in part, to the processing of their personal data for the purposes set out above, by simply making a request to the joint controllers at the addresses indicated above.

## **Data source**

The Data will be provided by the data subject or collected from third parties.

### **Methods of Data processing**

In compliance with the provisions of the art. 5 of the Regulation, the Personal Data processed will be:

1. processed in a lawful, correct and transparent manner towards the data subject;
2. collected and recorded for specific, explicit and legitimate purposes, and subsequently processed in terms compatible with these purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, if necessary, updated;
5. processed in a manner that guarantees an adequate level of security;
6. stored in a form that allows identification of the data subject for a period of time not exceeding the achievement of the purposes for which they are processed.

The processing will be carried out both with manual and/or IT and telematic tools with organization and processing logic strictly related to the purposes themselves and in any case in such a way as to guarantee the security, integrity and confidentiality of the data themselves in compliance with the organisational, physical and logic envisaged by the provisions in force.

### **Data communication**

The personal data may be communicated to the subjects authorized to process it, as well as to the external data processors appointed by the joint controllers (the complete list of external processors is available from the joint controllers), responsible for managing the purposes set out above. Subject to your consent, the Data may also be communicated to third-party sponsor companies and/or commercial partners of the joint controllers.

As part of the pursuit of the purposes indicated above, the data may be communicated to other subjects acting as independent data controllers.

The data may be communicated to:

- companies and consultants, in the field of legal, accounting and tax assistance and consultancy;
- entities that provide services for the management of the information system and telecommunications networks; including email, website management and newsletters;
- companies that collaborate with the joint data controllers for direct marketing activities;
- banks and other financial institutions for the management of payments and collections.

The information may also be communicated whenever communication may be necessary to comply with requests from the Judicial or Public Security Authorities.

### **Data dissemination**

Personal data will not be disseminated.

### **Data transfer abroad**

For the purposes indicated above, Personal Data will be processed within the European Economic Area (EEA). If they are transferred to Third Countries, in the absence of an adequacy decision from the European Commission, the provisions of the applicable legislation regarding the transfer of Personal Data to third Countries will still be respected, such as the Standard Contractual Clauses provided by the European Commission.

### **Data retention**

In general, Personal Data will be retained for the time strictly necessary to achieve the purposes for which they were collected and processed, including the retention period required by applicable legislation and, in any case, for a maximum period of 10 years from termination of the relationship with the joint controllers and for a maximum period of 2 years for the purposes for which your consent is required, except for any need for the joint controllers to defend their rights in court.

### **Rights of data subject**

Pursuant to EU Regulation 2016/679 articles. 15 et seq. as well as current national legislation, the data subject may, according to the methods and within the limits established by current legislation, exercise the following rights:

- request confirmation of the existence of personal data concerning him (right of access); - know their origin;
- receive intelligible communication;
- have information about the logic, methods and purposes of the processing;
- request its updating, rectification, integration, cancellation, transformation into anonymous form, blocking of data processed in violation of the law, including data no longer necessary for the pursuit of the purposes for which they were collected;
- the right to lodge a complaint with the Supervisory Authority (Privacy Guarantor);
- as well as, more generally, exercise all the rights recognized by the current legal provisions.

In general, to exercise the rights, the data subject can contact the joint controllers by writing to the contact details above.

Before providing a response, the joint controllers may need to identify the data subject.

Written feedback will be provided without unjustified delay and, in any case, no later than one month from receipt of the request.