



## **PRIVACY POLICY**

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PURSUANT TO ARTICLES. 13 AND 14 OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 AND D. LGS. 196/2003 AND SS.MM.II.

During the consultation of this website, personal information and data may be collected as stated in this policy. The policy refers only to this website.

### **The Data Controller**

The Data Controller is HTL S.R.L., P.IVA/C.F. 04037020270, con sede legale a Venezia Cannaregio 2283 . To exercise your rights listed below, you may contact the following telephone number: +39 041 2759333 or e-mail address: [info@momentumresort.com](mailto:info@momentumresort.com)

The Data Controller has not identified the figure of the Data Protection Officer (DPO or DPO), as it is not subject to the obligation of designation provided by Article 37 of the Regulations.

### **Types of data processed and purposes of processing**

Navigation data

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers and terminals used by users, the addresses in URI/URL (Uniform Resource Identifier/Locator) notation of the resources requested, 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 user's operating system and computer environment.

These data, necessary for the use of web services, are also processed for the purpose of:

- obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or daily, geographical areas of origin, etc.);
- check the proper functioning of the services offered.

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Browsing data do not persist for more than seven days (except for any need to ascertain crimes by the judicial authorities).

#### *Data communicated by the user*

*The optional, explicit and voluntary sending of messages to the contact addresses of the Owner, private messages sent by users to profiles/pages on social media (where this possibility is provided), as well as the completion and submission of forms on the Owner's website, involves the acquisition of the sender's contact data, necessary to respond, as well as all personal data included in the communications.*

The provision of certain personal data of the interested party is mandatory in order to use the services requested, and failure to provide such data may affect access. Mandatory personal data are marked with an asterisk.

In cases where some data are indicated as not mandatory, the interested party is free to refrain from communicating such data, without this having any consequence on the availability of the service or its operation.

Interested parties who are in doubt about which data are mandatory are encouraged to contact the Data Controller.

In particular, data may be collected through:

#### **"BOOK NOW" page**

By visiting the **"BOOK NOW" page**, the user will be redirected to the booking engine to make a reservation. Please refer to the privacy policy on that site for more information.

#### Cookies and other tracking systems

For details view the cookie policy presented on this website.

#### Legal basis for processing

The legal basis of the processing is as follows:

- the processing is necessary to comply with a legal obligation to which the Data Controller is subject, pursuant to Article 6(1)(c) of EU Regulation 2016/679;
- the processing is necessary for the pursuit of the legitimate interest of the Controller or third parties, pursuant to Article 6(1)(f) of EU Regulation 2016/679;
- the processing is necessary for the performance of a contract to which the data subject is party or the performance of pre-contractual measures taken at the request of the data subject, pursuant to Article 6(1)(b) of EU Regulation 679/2016;
- the processing is carried out on the basis of the data subject's expression of consent, pursuant to Article 6, paragraph 1, letter a) of EU Regulation 2016/679.

However, it is possible to request the Data Controller to clarify the concrete legal basis of each processing and in particular to specify whether the processing is based on law or provided for by a contractual or pre-contractual relationship.

## **Method of processing**

Data are processed by the company's designated personnel and are not disclosed to unauthorized third parties.

The processing is carried out by means of computer and/or telematic tools and in automated and/or manual form, in compliance with the provisions of Article 32 of GDPR 2016/679 on security measures, by specially appointed individuals and in compliance with the provisions of Article 29 of EU Regulation 2016/679.

The Data Controller takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of personal data.

In addition to the Data Controller, in some cases, other subjects involved in the provision of the services offered and in the organization of this website (hosting providers, IT companies, storage, collection, printing and shipment and management of e-mail, communication agencies, postal couriers) may have access to the data, also external subjects appointed, if necessary, Data Processors by the Data Controller. The updated list of Data Processors can always be requested from the Data Controller.

## **Transfer of personal data**

Data are processed at the Data Controller's operational offices and in any other place where the parties involved in the processing are located. For further information, please contact the Data Controller.

The data subject's personal data is not transferred outside the European Union.

## **Retention period**

In accordance with the principles of lawfulness, purpose limitation and data minimization, pursuant to Article 5 of EU Regulation 2016/679, the personal data of the data subject will be kept for the period of time necessary to achieve the purposes for which they are collected and processed or to defend/exercise a right.

When the processing is based on the data subject's consent, the Data Controller may keep the personal data longer until that consent is revoked. In addition, the Controller may be obliged to retain personal data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the personal data will be deleted. Therefore, when this period is reached, the right of access, deletion, rectification and the right to data portability can no longer be exercised.

## **Rights of the data subject**

At any time, the data subject may exercise, pursuant to Articles 15 to 22 of EU Regulation 2016/679, the right to:

- (a) request confirmation of the existence or non-existence of his/her personal data;
- b) obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the storage period;
- (c) obtain rectification and erasure of data;

(d) obtain restriction of processing;

e) obtain portability of data, i.e., receive them from a data controller, in a structured, commonly used and machine-readable format, and transmit them to another data controller without hindrance;

(f) object to the processing at any time; data subjects are reminded that if their data were processed for direct marketing purposes, they may object to the processing without providing any reasons.

g) request from the data controller access to personal data and the rectification or erasure of the same or the restriction of processing concerning them or to object to their processing, as well as the right to data portability;

(h) withdraw consent at any time without affecting the lawfulness of the processing based on the consent given before the withdrawal;

(i) Propose a complaint to a supervisory authority. The interested party has the right to propose a complaint to the Guarantor for the Protection of Personal Data, based in Rome at Piazza Venezia n. 11 (tel. +39 06 696771), following the procedures and directions published on the Authority's website [www.garanteprivacy.it](http://www.garanteprivacy.it).

### **Contacts of the Data Controller**

You may contact the Data Controller at the following contacts:

- via e-mail, at: [info@cagottardi.com](mailto:info@cagottardi.com)

- via telephone: +39 041 2759333

- via regular mail: CA' GOTTARDI- CANNAREGIO 2283 30121 VENEZIA

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