#### PRIVACY POLICY

## Last updated March 02, 2023

This privacy notice for Agriturismo La Castellana ('Company', 'we', 'us', or 'our'), describes how and why we might collect, store, use, and/or share ('process') your information when you use our services ('Services'), such as when you:

- Visit our website at <a href="http://www.agriturismolacastellana.it">http://www.agriturismolacastellana.it</a>, or any website of ours that links to this privacy notice
- Engage with us in other related ways, including any sales, marketing, or events

Questions or concerns? Reading this privacy notice will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at info@agriturismolacastellana.it.

#### **SUMMARY OF KEY POINTS**

This summary provides key points from our privacy notice, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for. You can also click here to go directly to our table of contents.

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with Agriturismo La Castellana and the Services, the choices you make, and the products and features you use. Click here to learn more.

Do we process any sensitive personal information? We do not process sensitive personal information.

Do we receive any information from third parties? We do not receive any information from third parties.

**How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Click <a href="here">here</a> to learn more.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Click <a href="here">here</a> to learn more.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Click here to learn more.

**How do you exercise your rights?** The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what Agriturismo La Castellana does with any information we collect? Click <u>here</u> to review the notice in full.

# **TABLE OF CONTENTS**

- 1. WHAT INFORMATION DO WE COLLECT?
- 2. HOW DO WE PROCESS YOUR INFORMATION?
- 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR PERSONAL INFORMATION?
- 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?
- 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
- 6. HOW LONG DO WE KEEP YOUR INFORMATION?
- 7. DO WE COLLECT INFORMATION FROM MINORS?
- 8. WHAT ARE YOUR PRIVACY RIGHTS?
- 9. CONTROLS FOR DO-NOT-TRACK FEATURES
- 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
- 11. DO VIRGINIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
- 12. DO WE MAKE UPDATES TO THIS NOTICE?
- 13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
- 14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

## 1. WHAT INFORMATION DO WE COLLECT?

### Personal information you disclose to us

In Short: We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us.

**Sensitive Information.** We do not process sensitive information.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

# Information automatically collected

**In Short:** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

## 2. HOW DO WE PROCESS YOUR INFORMATION?

**In Short:** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

- To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have with the requested service.
- **To fulfil and manage your orders.** We may process your information to fulfil and manage your orders, payments, returns, and exchanges made through the Services.
- To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

## 3. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

**In Short:** We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

The General Data Protection Regulation (GDPR) and UK GDPR require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

- Consent. We may process your information if you have given us permission (i.e. consent) to use
  your personal information for a specific purpose. You can withdraw your consent at any time.
  Click here to learn more.
- Performance of a Contract. We may process your personal information when we believe it is
  necessary to fulfil our contractual obligations to you, including providing our Services or at your
  request prior to entering into a contract with you.
- Legal Obligations. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.
- Vital Interests. We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as situations involving potential threats to the safety of any person.

## 4. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

*In Short:* We may share information in specific situations described in this section and/or with the following third parties.

We may need to share your personal information in case of Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

#### 6. HOW LONG DO WE KEEP YOUR INFORMATION?

**In Short:** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

# 7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at info@agriturismolacastellana.it.

# 8. WHAT ARE YOUR PRIVACY RIGHTS?

**In Short:** In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section <u>'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?'</u> below.

We will consider and act upon any request in accordance with applicable data protection laws.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: <a href="https://ec.europa.eu/justice/data-protection/bodies/authorities/index">https://ec.europa.eu/justice/data-protection/bodies/authorities/index</a> en.htm.

If you are located in Switzerland, the contact details for the data protection authorities are available here: https://www.edoeb.admin.ch/edoeb/en/home.html.

<u>Withdrawing your consent</u>: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section <u>'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?'</u> below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

<u>Cookies and similar technologies:</u> Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt out of interest-based advertising by advertisers on our Services visit <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a>.

If you have questions or comments about your privacy rights, you may email us at info@agriturismolacastellana.it.

## 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 10. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

**In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the 'Shine The Light' law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

# 11. DO VIRGINIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

**In Short:** Yes, if you are a resident of Virginia, you may be granted specific rights regarding access to and use of your personal information.

# **Virginia CDPA Privacy Notice**

Under the Virginia Consumer Data Protection Act (CDPA):

'Consumer' means a natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context.

'Personal data' means any information that is linked or reasonably linkable to an identified or identifiable natural person. 'Personal data' does not include de-identified data or publicly available information.

'Sale of personal data' means the exchange of personal data for monetary consideration.

If this definition 'consumer' applies to you, we must adhere to certain rights and obligations regarding your personal data.

The information we collect, use, and disclose about you will vary depending on how you interact with Agriturismo La Castellana and our Services. To find out more, please visit the following links:

- Personal data we collect
- How we use your personal data
- When and with whom we share your personal data

#### Your rights with respect to your personal data

Right to be informed whether or not we are processing your personal data

- Right to access your personal data
- Right to correct inaccuracies in your personal data
- Right to request deletion of your personal data
- Right to obtain a copy of the personal data you previously shared with us
- Right to opt out of the processing of your personal data if it is used for targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarly significant effects ('profiling')

Agriturismo La Castellana has not sold any personal data to third parties for business or commercial purposes. Agriturismo La Castellana will not sell personal data in the future belonging to website visitors, users, and other consumers.

# Exercise your rights provided under the Virginia CDPA

More information about our data collection and sharing practices can be found in this privacy notice.

You may contact us by email at info@agriturismolacastellana.it or by referring to the contact details at the bottom of this document.

If you are using an authorised agent to exercise your rights, we may deny a request if the authorised agent does not submit proof that they have been validly authorised to act on your behalf.

### Verification process

We may request that you provide additional information reasonably necessary to verify you and your consumer's request. If you submit the request through an authorised agent, we may need to collect additional information to verify your identity before processing your request.

Upon receiving your request, we will respond without undue delay, but in all cases, within forty-five (45) days of receipt. The response period may be extended once by forty-five (45) additional days when reasonably necessary. We will inform you of any such extension within the initial 45-day response period, together with the reason for the extension.

## Right to appeal

If we decline to take action regarding your request, we will inform you of our decision and reasoning behind it. If you wish to appeal our decision, please email us at info@agriturismolacastellana.it. Within sixty (60) days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If your appeal if denied, you may contact the Attorney General to submit a complaint.

## 12. DO WE MAKE UPDATES TO THIS NOTICE?

In Short: Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated 'Revised' date and the updated version will be effective as soon as it is accessible. If we make

material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

# 13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at info@agriturismolacastellana.it or by post to:

Agriturismo La Castellana Fraz. Costa di Trex

Assisi, Perugia 06081

Italy

# 14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it. To request to review, update, or delete your personal information, please send a request form to info@agriturismolacastellana.it.

This privacy policy was created using <u>Termly's Privacy Policy Generator</u>.