



## PRIVACY POLICY STATEMENT

This page describes how the website is managed with regard to the processing of personal data of users consulting it, as well as the methods and purposes of data processing.

This information is provided pursuant to articles 13-14 of Regulation (EU) 2016/679 - hereinafter, GDPR - to those who interact with web services accessible by electronic means from the addresses:

[www.incomingexperience.it](http://www.incomingexperience.it)

This website is the property of **CONSORZIO TURISTICO INCOMING EXPERIENCE**, which manages and maintains it for the purpose of providing information and communications relating to the products or services offered.

This information is provided only for the website in question and not for other websites that may be consulted through our links, for which **CONSORZIO TURISTICO INCOMING EXPERIENCE** is in no way responsible.

**CONSORZIO TURISTICO INCOMING EXPERIENCE**, with offices in Via Berthollet, 19, 10125 - Torino (TO), in its capacity as Data Controller of your personal data, pursuant to and in accordance with EU Reg. 2016/679 - GDPR, hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

### Contact details of the Data Controller

The Data Controller can be contacted at the following addresses:

- Phone: **(+39) 011 6505309**
- Email: **info@hotelexperience.net**

Your personal data will be processed in accordance with the legal provisions of the aforementioned legislation and the confidentiality obligations therein.

## TYPES OF DATA PROCESSED

### Navigation data

As part of their standard operations, the IT systems and software procedures used to run this website acquire certain pieces of personal data, which must be transmitted in order to use internet communication protocols. This information is not collected to be associated with specific data subjects, but could, for its very nature, allow the users to be identified if processed and associated with data held by third parties. This category of data includes the IP addresses or domain names of the computers used by those who connect to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received 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 computing environment. These data are used for the sole purpose of gathering anonymous statistical information on the use of the website and to make sure it is working correctly and is cancelled immediately after being processed. The data may be used to ascertain liability in the event of hypothetical computer crimes against the website.

### Data provided voluntarily by the user

- **SENDING COMMUNICATIONS TO OUR EMAIL ADDRESSES:** the optional, explicit and voluntary sending of electronic mail to the addresses indicated on this website, for the purpose of sending specific requests, entails the subsequent acquisition of the sender's address, which is necessary for replying to requests, as well as any other personal data included in the message.
- **INFORMATION REQUESTS:** the completion of the data collection form, explicitly and voluntarily, for the purpose of information requests, entails the subsequent acquisition of the sender's address, which



is necessary to respond to requests, as well as any other personal data included in the information request.

## **PROCESSING METHODS**

The data are processed primarily by electronic and computerised means and stored both on computer media and on paper media as well as on any other suitable media, in compliance with the methods set out in articles 6, 32 of the GDPR and by adopting the appropriate security measures to prevent loss of data, unlawful or incorrect use and unauthorised access.

We would like to inform you that, in order to provide a complete service, our portal may contain links to other websites, which are not operated by us. We are not responsible for errors, content, cookies, publications with unlawful moral content, advertisements, banners or files that do not comply with the regulations in force, and for compliance with the Privacy legislation by websites not operated by us to which reference is made. In order to improve the service offered, we welcome any immediate reports of malfunctions, abuses or suggestions to the e-mail address: [info@hotelexperience.net](mailto:info@hotelexperience.net)

Your data will only be processed by personnel expressly authorised by the Data Controller.

## **PURPOSE OF PROCESSING AND LEGAL BASIS**

The data will be processed for the following purposes:

1. Website navigation. The legal basis for the processing is the consent of the data subject, pursuant to art. 6, par. 1, lett. a) of the Regulation. Providing data for these purposes is optional, but failure to do so would make it impossible to browse the website;
2. process requests for information, quotes, technical support. The legal basis for the processing is the consent of the data subject, pursuant to art. 6, par. 1, lett. a) of the Regulation. Providing data for these purposes is optional, but failure to do so would make it impossible to obtain the requested response.
3. provide information on services and products provided and about changes in products or services. The legal basis for the processing is the consent of the data subject, pursuant to art. 6, par. 1, lett. a) of the Regulation. Providing data for these purposes is optional, but failure to do so would make it impossible to obtain the requested response;
4. fulfil obligations under laws or regulations. For this purpose, the processing is necessary to fulfil a legal obligation to which the Data Controller is subject, pursuant to art. 6, par. 1, lett. c) of the Regulation.
5. the protection of the Data Controller in court. For this purpose, the processing is necessary for the pursuit of the legitimate interest of the Data Controller pursuant to art. 6, par. 1, lett. f) of the Regulation;

## **ENTITIES TO WHICH PERSONAL DATA MAY BE DISCLOSED**

The personal data relating to the processing in question may also be disclosed to entities who are granted the right to access your personal data by law or secondary and/or EU regulations. Your data may only be communicated to competent entities duly appointed for the performance of the services necessary for the proper management of the relationship, with guaranteed protection of the rights of the data subject. Furthermore, some data may be communicated and disseminated to the Internet operators that CONSORZIO TURISTICO INCOMING EXPERIENCE uses to manage its domains.

Your personal data will not be disseminated in any way.

## **PERIOD OF RETENTION FOR PERSONAL DATA**

We would like to inform you that, in compliance with the principles of lawfulness, purpose limitation and data minimisation, in accordance with art. 5 of the GDPR, the period of retention your personal data is set for a period necessary for the performance of the requested services and in compliance with the regulations in force regarding the retention of tax, fiscal and contractual documents.



## **RIGHTS OF THE DATA SUBJECT**

1. The data subject has the right to obtain confirmation of the existence or non-existence of personal data concerning him/her, even if not yet recorded, and its communication in intelligible form.
2. A data subject shall have the right to be informed:
  - a. of the source of the personal data;
  - b. of the purposes and methods of the processing;
  - c. of the logic applied to the processing, if the latter is carried out with the help of electronic means;
  - d. of the identification data concerning the data controller, data processors and the representative designated as per Section 5(2);
  - e. of the entities or categories of entities to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.
3. A data subject shall have the right to obtain:
  - a. the updating, rectification or, where interested therein, integration of the data;
  - b. erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;
  - c. certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.
  - d. data portability.
4. A data subject shall have the right to object, in whole or in part:
  - a. on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;
  - b. to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising material or direct selling or else for the performance of market or commercial communication surveys.
5. The data subject has the right to request the restriction of processing.

He/she may exercise his/her rights by sending an e-mail to [info@hotelexperience.net](mailto:info@hotelexperience.net) or by sending a written request to the above-mentioned addresses.

In addition, if the data subject considers that the processing of his/her data is contrary to the legislation in force, he/she may lodge a complaint with the Data Protection Supervisory Authority pursuant to art. 77 of Regulation 2016/679 or file a report pursuant to art. 144 of Legislative Decree 101/2018.