

PRIVACY NOTICE AND CONSENT TO PERSONAL DATA PROCESSING

A) The Client acknowledges this privacy notice provided by Campeggio PuntaAla S.r.l., VAT no. 00225550532, based in 58043 Punta Ala, Castiglione della Pescaia, Grosseto, Italy, in conformity with the obligations of national law (Italian Legislative Decree 30 June 2003 no. 196, Data Protection Code) and EU law, (European General Data Protection Regulation no. 679/2016, GDPR) as amended, on the processing of **personal data** by the **methods** and for the **purposes** described below, communicated when concluding the contract for the Controller's services.

Personal data of identifying nature (for example, name, surname, company name, address, telephone number, email address, bank details and payment details) provided by you will be processed by the Controller in respect of conditions of lawfulness pursuant to Art. 6 EU Reg. 2016/679:

1. without your express consent (Art. 24 letter a), b), c) of the Privacy Code as amended (provisions for the adjustment of national law to the contents of regulation EU 2016/679) and Art. 6 letter b), e) GDPR, for the following Service Purposes: a) to carry out the requested service or performance, to conclude contracts for the Controller's services; b) to fulfill pre-contractual, contractual and fiscal obligations deriving from the relationships held with you;

c) to fulfil obligations envisaged by law, by a regulation, by EU legislation or by an order of the Authority (such as in relation to anti-money laundering); d) to exercise the Controller's rights, for example, the right to defend legal claims. For the aforementioned purposes, your data may be communicated to the judicial authorities and to those entities to which their communication is mandatory by law for the fulfilment of those purposes. Those entities will process the data in their capacity as autonomous controllers. Your data will not be disseminated.

2. without your express and prior consent, as envisaged by Art. 130, paragraph IV, Privacy Code, as amended (provisions for the adjustment of national law to the contents of regulation EU 2016/679), for the following Marketing Purposes: e) to process the email details (i.e. email address) provided by you when purchasing a product and/or a service offered and sold directly by Campeggio, to allow Campeggio to perform the direct sale of products or similar services (and therefore to send by email promotional communications about those products and/or services), provided that you do not exercise the right to object by the methods indicated below (known as soft-spam). You may object to the receipt of soft-spam communications by contacting Campeggio PuntaAla S.r.l. at the following details: info@campingpuntaala.it or via the specific link found in every promotional communication sent by Campeggio PuntaAla S.r.l. For the aforementioned purposes, your data will not be communicated to third parties, subject to any legal obligations or requests of the Judicial Authority, and they will not be disseminated.

3. only subject to your specific and separate consent (Articles 23 and 130 of the Privacy Code as amended (provisions for the adjustment of national law to the contents of regulation EU 2016/679) and Art. 7 GDPR), for the following Marketing Purposes: f) to send to you - by automated contact methods (e.g. email and/or SMS and/or instant messaging, as MessengerPeople GmbH - WhatsApp, Notify, Instagram and Telegram) and traditional methods (e.g. traditional post and/or telephone calls with operator) - newsletters, sales communications and/or advertising material on products or services offered by the Controller even other than those for the supply of which the data were collected and to identify the level of satisfaction with the quality of the services; g) to send to you (by email, post and/or SMS and/or instant messaging and/or telephone calls) newsletters, sales and/or promotional communications of third parties (for example, business partners); h) to carry out activity of analyzing choices and consumer habits in order to improve the offer of services for subsequent stays, to send you customized sales communications/to carry out targeted promotion actions, for business intelligence; i) to carry out prize competitions and customer loyalty programs. For the above purposes, your data will not be communicated to third parties, except when required by law or requested by the Judicial Authority, and they will not be disseminated.

4. only subject to your specific and separate consent (Articles 23 and 130 of the Privacy Code as amended (provisions for the adjustment of national law to the contents of regulation EU 2016/679) and Art. 7 GDPR), for the following Marketing Purposes: l) disclosure of your personal data for their advertising purposes to the companies CENTRO VELICO PUNTA ALA A.S.D. (VAT No. - Tax Code 01356920536) with head office at loc. Punta Ala - c/o PuntaAla Camp & Resort Loc. Punta Ala - 58043 Castiglione della Pescaia (GR), PUNTA ALA TRAIL CENTER A.S.D. (VAT No. - Tax Code 01647880531) with head office at loc. Punta Ala - c/o Campeggio PuntaAla - 58043 Castiglione della Pescaia (GR) and PUNTALA AMBIENTE S.R.L. (VAT No. - Tax Code 01415020534) with head office at Via Zanardelli, 1 - Grosseto (GR), BLACK ROOSTER A.S.D. (Tax Code 95120230248, VAT No. 06876670487) with head office at Via Corte Grifoni 4 - 50012 Bagno a Ripoli (FI), GYMTRAINER S.R.L. (VAT No. - Tax Code 04643350236) with head office at San Marino Buon Albergo, Via XX Settembre 32/a, 37036 -Verona (VR), PUNTA ALA SUP EXPERIENCE A.S.D.(VAT No. - Tax Code 01708190531) with head office at loc. Punta Ala - c/o PuntaAla Camp & Resort Loc. Punta Ala - 58043 Castiglione della Pescaia (GR) and suppliers of other services hosted in the area where our structure is located, and of which we will provide the details. Your data may be made accessible for the purposes indicated in points 1., 2., 3. and 4.: - to employees and collaborators of the Controller or partner companies and/or entities in Italy and abroad, in their capacity as officers and/or internal processors and/or system administrators; - to third party companies or other entities (for example, credit institutions, professional firms, consultants, insurance companies for the provision of insurance services, etc.) which carry out outsourced activity on behalf of the Controller, in their capacity as external processors.

The PuntaAla app, downloadable from the App store and Google Play, which can be used by the user to open doors within the facility, may require the use of the user's location. If explicitly requested by the application, this permission is for the sole purpose of ensuring its proper technical operation. User location data are not collected by the data controller.

Your personal data will be processed by the Data Controller within the European Union. Should it become necessary, for technical and/or operational reasons, to use entities located outside the European Union, or should it become necessary to transfer some of the collected data to technical systems and services managed in the cloud and located outside the European Union, data processing will be regulated in accordance with Chapter V of the Regulation and authorized on the basis of specific European Union decisions. All necessary precautions will therefore be taken to ensure the fullest protection of personal data by basing the transfer: a) on adequacy decisions of the receiving third countries expressed by the European Commission; b) on adequate guarantees expressed by the receiving third party pursuant to Art. 46 of the Regulation; c) on the adoption of binding corporate rules, so called Corporate binding rules.

B) The **provision of data** for the purposes indicated in above point 1. is mandatory. In their absence, we will not be able to provide you with the Services indicated in point 1. The **legal basis** for the processing of those data is the performance of a contract to which you are party or the need to comply with legal obligations. The legal basis of the data processing for the purposes indicated in point 2. above is Art. 130, paragraph IV of the Privacy Code as amended (provisions for the adjustment of national law to the contents of regulation EU 2016/679) which expressly permits the processing in question. The provision of data for the purposes indicated in points 3. and 4. above is, on the other hand, optional. You can therefore decide not to provide any data or to deny later the possibility of processing data already provided: in that case, you will not be able to receive newsletters, sales communications and advertising material relating to the Services offered by the Controller. You will, however, continue to be entitled to the Services indicated in point 1. The legal basis of the processing of those data is consent (optional and revocable at any time). The Controller processes some of the data based upon the controller's legitimate interests.

C) The data in question will be processed:

- on paper and electronic media of any kind.
- by authorized persons whose identity is always known, who are suitably instructed and made aware of the constraints imposed by applicable laws.
- for the **time** strictly necessary to achieve the purposes for which they were collected.
- with a commitment to keep data promptly updated, erasing obsolete, unnecessary or irrelevant data.
- with a commitment to adopt the organizational and security measures required by law to guarantee the confidentiality of the data subject and to avoid undue access by third parties or unauthorized persons.

D) The personal data collected will be stored in compliance with Article 5, paragraph 1, letter e) of EU Regulation 2016/679, in a form that allows the identification of the data subjects for a period no longer than necessary to achieve the purposes for which the personal data are processed and, in any case, for no more than 10 years from the termination of the relationship for Service Purposes. Personal data processed for Marketing Purposes will be retained for a maximum period of 24 months from the collection of consent or until its possible revocation by the data subject, if earlier. After this period, the data will be deleted or irreversibly anonymized, except for the processing of any data necessary to fulfill contractual, accounting, or legal obligations, which will be retained for the period required by the relevant regulations (e.g. up to 10 years). The data subject has the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

E) The **Controller** is Campeggio PuntaAla S.r.l., VAT no. 00225550532, with head office at 58043 Punta Ala, Castiglione della Pescaia, Grosseto, Italy, tel. +390564922254 fax. +3905649220379, e-mail: info@campingpuntaala.it.

The data processing officers are the employees and/or collaborators of CAMPEGGIO PUNTALA s.r.l. The data may be processed by employees and/or collaborators of the company departments in charge of pursuing the purposes indicated above, which have been expressly authorized to process the data and have received appropriate operating instructions.

ZUCCHETTI HOSPITALITY SRL, tax code 0289417202, with head office at Via Solferino, 1, 26900 Lodi is the Processor, processing personal data on behalf of the





Controller.

The updated list of processors and officers is kept at the Controller's head office.

F) In accordance with European Regulation 679/2016 (GDPR) and national law, you may, by the methods and within the limits envisaged by existing legislation, exercise the following **rights**:

- request confirmation of the existence of personal data relating to you (right of access);
- know of their origin.
- receive their intelligible communication.
- obtain information on the logic, methods and purposes of processing.
- request their update, rectification, supplementation, erasure, transformation into anonymous form, block on data processed in violation of the law, therein including data no longer necessary for pursuing the purposes for which they were collected.
- in cases of processing based upon consent, receive - only at the cost of any support - your data provided to the controller, in structured, commonly-used and machine-readable format, subject to paragraphs 3 and 4 of Art. 20 of Reg. (EU) 2016/679;
- if you believe that the data relating to you is being processed in violation of the contents of Reg. EU 2016/679, in accordance with Art. 15 letter f) of the aforementioned Reg. EU 2016/679, the right to lodge a complaint with the Data Protection Supervisory Authority and, with reference to Art. 6, paragraph 1, letter a) and Art. 9, paragraph 2, letter a), the right to withdraw the consent provided at any time;
- if the data are processed based upon legitimate interests, the rights of the data subjects are in any case guaranteed (except the right to portability which is not envisaged by the rules), particularly, the right to object in whole or in part to processing, which can be exercised by sending a request to the controller.
- the right of the data subject to object to the processing of his/her personal data for marketing purposes, carried out using automated contact methods, extends to traditional methods and, in any case, is subject to the possibility for the data subject to exercise that right even partly, objecting, for example, only to the sending of promotional communications via automated tools.

- as well as, more generally, to exercise all rights that are recognized by existing legal provisions.

You may exercise your rights as expressed by Articles 15, 16, 17, 18, 19, 20, 21, 22 of Regulation EU 2016/679, by contacting the Controller with a request sent to Campeggio Puntala S.r.l. with head office in 58043 Punta Ala, Castiglione della Pescaia, Grosseto, Italy, tel. +390564922254 fax. +390564920379, e-mail: info@campingpuntala.it, even by email, telephone or fax, with the right to obtain evidence that the request has been dealt with at the outcome of the same.

I declare to have read the privacy notice and to acknowledge its

contents. Read, approved and signed

Date _____ Client's signature _____

Having read the contents of the *privacy* notice, I freely consent to the processing of my personal data for the transmission, by automated contact methods (e.g. SMS, email and instant messaging and - by way of platforms such as Messenger, People, WhatsApp, Instagram Direct, Facebook Messenger and Telegram) and by traditional methods (e.g. telephone calls with operator and traditional post) of newsletters, sales communications and/or advertising materials containing information on products or services offered by Campeggio Puntala S.r.l. or by third parties, prize competitions and customer loyalty programmes, for purposes connected to marketing activities indicated in point 3. of the privacy notice

Read, approved and signed

Date _____ Client's signature _____

Having read the contents of the privacy notice, I freely consent to the processing of my personal data for communications to third parties of the personal data for their promotional purposes (purposes at point 4. of the privacy notice).

Read, approved and signed

Date _____ Client's signature _____

