#### PRIVACY POLICY OF THE WEBSITE WWW.ALPHOLIDAY.IT

Hotel AlpHoliday Dolomiti explains, on this page, how it processes the data of users who visit its site and how the cookies that are installed by the site act.

This Privacy Policy is made in compliance with Article 13 of the GDPR 2016/679 (General Data Protection Regulation, European Data Protection Regulation), the Privacy Guarantor's Guidelines of June 10, 2021, the EDPB Guidelines 5/2020 referring to consent, the ECJ Judgment October 1, 2019 C-673/17, the General Measure of the Privacy Guarantor on Cookies of May 8, 2014, no. 229, the "Working Document 02/2013 providing guidance on obtaining consent for cookies," WP 29 Opinion No. 4/2012 On Cookie Consent Exemption, Directive 2002/58/EC, and Recommendation No. 2/2001 of the Working Group Article 29.

The following applies only to the site www.alpholiday.it; the Data Controller is not responsible for the data entered and cookies installed by other sites that may be consulted through links.

### Information about the data controller and data protection officer (if any)

The Data Controller is Hotel AlpHoliday Dolomiti, with registered office in via Campiglio 4, 38025 Dimaro (TN).

To exercise your rights under the regulations, you can contact the Data Controller at its office or by calling +39 0463973330 or writing to info@alpholiday.it

# Purpose and legal basis for processing

The Data Controller explains below for what purposes it processes site user data.

Purpose of processing	Fulfilling legal obligations				
Description	Data processing is necessary for the fulfillment of obligations required by law,				
	regulation, or EU legislation				
Legal Basis	Fulfillment of a legal obligation to which the data controller is subject (Art. 6				
	para. 1 lit. c) GDPR 2016/679)				
Nature of conferment	The provision of data is necessary to fulfill a legal obligation				
Consequences of failure to	N.A.				
confer					
Storage time	That required by the relevant legislation				
Effective retention time	From the provision of data				
Purpose of processing	Statistical analysis on aggregated or anonymized data				
Description	The processing does not allow user identification, but serves to verify the				

adequacy of the web marketing campaigns adopted and/or the proper functioning of the site, measuring the user traffic it generates. The processing of aggregated or anonymous data, which do not allow the identification of the user, does not fall under the scope of the legislation on the protection of

personal data and therefore no consent is required for their processing.

Legal Basis N.A.

Nature of conferment N.A.

Consequences of failure to N.A.

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Storage time N.A.

Effective retention time N.A.

Purpose of processing Handling of requests to exercise rights

**Description** Data processing is necessary to handle requests for the exercise of rights sent

by the data subject, pursuant to Articles 15-22 of the GDPR.

Legal Basis Fulfillment of a legal obligation to which the data controller is subject (Art. 6

para. 1 lit. c) GDPR 2016/679)

**Nature of conferment** The provision of data is necessary to fulfill a legal obligation

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Consequences of failure to

Failure to provide data may result in the total or partial inability to respond to

the submitted request.

**Storage time** 5 years

**Effective retention time** From the provision of data

Purpose of processing Information Request/Contacts

**Description** Data processing is necessary to provide feedback to your request.

Legal Basis Execution of a contract to which the data subject is a party or execution of pre-

contractual measures taken at the request of the data subject (Art. 6 para. 1

lit. b) GDPR 2016/679)

Nature of conferment The provision of data is necessary to fulfill a contractual obligation

Consequences of failure to Failure to provide data may result in the total or partial inability to respond to

confer the submitted request.

**Storage time** 5 years

**Effective retention time** From the provision of data

Purpose of processing Availability request

**Description** Data processing is necessary to provide feedback to the availability request on

the dates indicated

**Legal Basis** Execution of a contract to which the data subject is a party or execution of pre-

contractual measures taken at the request of the data subject (Art. 6 para. 1

(b) GDPR 2016/679)

Nature of conferment The provision of data is necessary to fulfill a contractual obligation

Consequences of failure to Failure to provide data may result in total or partial inability to respond to the

confer submitted request.

**Storage time** 5 years

**Effective retention time** From the provision of data

Purpose of processing Reservation of stay

**Description** Data processing is necessary to book the stay at the Facility

Legal Basis Execution of a contract to which the data subject is a party or execution of pre-

contractual measures taken at the request of the data subject (Art. 6 para. 1

(b) GDPR 2016/679)

**Nature of conferment** The provision of data is necessary for the conclusion of a contract

Consequences of failure to Failure to provide data may result in the total or partial inability to respond to

the submitted request.

Storage time 10 years

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**Effective retention time** From the provision of data

Purpose of processing Newsletter

**Description** Processing is required to subscribe to the newsletter and receive commercial

communications

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

Nature of conferment The provision of data is optional

Consequences of failure to Failure to provide data will only result in non-subscription and inability to

receive the newsletter

Storage time Until consent is revoked

**Effective retention time** From the consensus

Purpose of processing Marketing in general

**Description** The processing is necessary to receive commercial communications in the

manner provided by the Data Controller, which may be, by way of example

and, e-mail, SMS, paper material etc.

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

Nature of conferment The provision of data is optional

Consequences of failure to Failure to provide data will only result in the inability to receive commercial

**confer** communications

Storage time Until consent is revoked

**Effective retention time** From the consensus

Purpose of processing Third-party marketing

**Description** Processing is necessary to receive commercial communications from parties

other than the Data Controller and better identified when requesting consent.

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

**Nature of conferment** The provision of data is optional.

Consequences of failure to Failure to provide data will only result in the inability to receive commercial

communications from third parties

**Storage time** The retention time is determined by the third party

**Effective retention time** The retention time is determined by the third party

Purpose of processing Profiling

**Description** Processing is necessary to perform user profiling in order to provide users with

a browsing or shopping experience tailored to their characteristics and the

individual user

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

Nature of conferment The provision of data is optional

Consequences of failure to Failure to provide data will result in the inability to perform user profiling

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**Storage time** 5 years

**Effective retention time** From the consensus

Purpose of processing Stay insurance

**Description** Treatment is required to purchase insurance for the stay

**Legal Basis** Execution of a contract to which the data subject is a party or execution of pre-

contractual measures taken at the request of the data subject (Art. 6 para. 1(b)

GDPR 2016/679)

**Nature of conferment** The provision of data is necessary for the conclusion of a contract

Consequences of failure to Failure to provide data may result in the total or partial inability to respond to

the submitted request.

Storage time 10 years

**Effective retention time** From the provision of data

Purpose of processing Geolocation and user location

**Description** Authorization is required to allow the site to locate your location

Legal Basis Consent of the data subject (Art. 6 para. 1. lett. a) GDPR 2016/679)

Nature of conferment Authorization is optional, failure to authorize will result in the inability to track

the user's location

Consequences of failure to Failure to provide data may result in the total or partial inability to respond to

the submitted request.

Storage time Until consent is revoked

**Effective retention time** From the consensus

### Methods of processing, automated decision making.

Data processing is carried out in computer-based mode, although potential processing in paper-based mode is not excluded. No automated decision-making processes are used to process your personal data.

Any profiling by cookies is done against specific user consent: more information is available in the cookie policy and/or information banner at first access.

User profiling carried out by means other than cookies is described in the section "Purposes of processing," where carried out.

## Target audience

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Your data may be disclosed to the following categories of recipients:

- Computer service providers and hosting companies to ensure the operation of the site and other explicit purposes
- Communications companies, agencies, marketing consultants and platform providers for sending promotional communications
- Platforms that enable the use of specific services (e.g., e-commerce, courses, electronic payment systems, etc.)
- Public authorities, administrations and agencies.

#### Transfer of data to third countries or international organizations

Data disclosed may be transferred to third countries and/or international organizations outside the EU. The transfer is legitimized by the presence of an adequacy decision. The service providers listed below may transfer your personal data outside the European Union. In detail:

SUPPLIER	DATA TRANSFER STATUS	ADEQUACY DECISION		
Google (Google Tag Manager,	USA	EU-US Data Privacy Framework of		
Font etc.)		10.07.2023		

The hosting of the site is in Italy.

# Rights of the data subject and complaint to the Privacy Guarantor

You have the right to ask us at any time for access to the data concerning you, their amendment, supplementation or deletion, the restriction or opposition to their processing, where there are legitimate reasons, as well as the portability of these data to another Data Controller. We will provide you with a response in writing within 30 days. You may revoke, at any time, the consents you have given on this site, by contacting

Authority, where yo	u believe that youi	r data has been p	orocessed unlav	vtully.	