

## PRIVACY POLICY

(pursuant to Article 13 Regulation (EU) 2016/679 - 'GDPR')

The site [www.tenutasantanna.it](http://www.tenutasantanna.it) (hereinafter '**Site**') is owned by Società Agricola Le Tenute del Leone Alato S.p.A. (VAT No. 01376530323), with registered office in Via Trento, 8 34132 Trieste TS.

With this Privacy Policy, Società Agricola Le Tenute del Leone Alato S.p.A. informs each user of the Site (hereinafter the '**Data Subject**') that the data provided when accessing the Site and interacting with it will be processed in compliance with the provisions set forth below on the processing of personal data.

### 1. Data Controller

The data controller is Società Agricola Le Tenute del Leone Alato S.p.A. (VAT No. 01376530323) with registered office in Via Trento, 8 34132 Trieste TS and Trieste Register of Companies no. REA (economic and administrative index): TS – 209974 e-mail: [privacy@leonealato.net](mailto:privacy@leonealato.net) (hereinafter referred to as the 'Data Controller').

### 2. Nature of data processed

The personal data of Data Subjects are processed. Personal data means any information relating to a natural person, identified or identifiable even indirectly by reference to any other information (the '**Data**').

In particular, the Data that may be collected are as follows:

- Contact Data: name, surname, physical address, e-mail and telephone contact.
- Other Data: if you decide to provide it, date of birth.

Società Agricola Le Tenute del Leone Alato S.p.A., through the Site, also collects and records the Data Subject's browsing data, which allow access to the Site as well as browsing on the same and are used in an anonymous and aggregated form for statistical purposes and to verify the proper functioning of the Site.

### 3. Purpose of processing

The processing is carried out using manual, computerised and telematic tools with logics strictly related to the purposes and, in any case, in such a way as to guarantee the security and confidentiality of the Data in compliance with the regulations in force, and is aimed at:

- A) the purchase of services on the Site and for activities functional and incidental to the performance of contractual relations, as well as for any necessary pre- and post-sales assistance;
- B) sending answers to the requests of the Data Subject by sending an e-mail to the address indicated in the 'Contacts' section of the Site;

- C) sending of commercial communications by the Controller regarding services offered by the Controller itself, and/or by business partners, concerning leisure activities, travel, catering, food and wine experiences and other related services;
- D) improvement of the offer of the Controller in order to make it more suitable to the preferences of the Data Subject, through the sending of personalized commercial communications, based on profiling (i.e. detecting the consumption preferences of the Data Subject through automated or electronic analysis of purchases and navigation on the Site);
- E) sending of commercial communications aimed at the offer of services similar to those already purchased or used by the Data Subject pursuant to art. 130, co. 4 of Legislative Decree 196/2003 (“Privacy Code”), using the email contact indicated for such occasions. The Data Subject has the right to object to such processing at any time by sending an e-mail to [privacy@leonealato.net](mailto:privacy@leonealato.net) or by following the instructions at the bottom of the communication;
- F) the fulfilment of obligations laid down by law, regulations, EU legislation or an order of the Authority;
- G) the exercise of the Data Controller’s rights, e.g. the right of defence in Court.

#### **4. Legal basis for processing**

The processing of Data for the purposes referred to in Article 3 letter A) above has its legal basis in the performance of a contract to which the Data Subject is a party or the execution of pre-contractual measures taken at the request of the same pursuant to Article 6 (1) (b) of the GDPR.

The processing of Data for the purpose referred to in Article 3 letter B) above is necessary for pursuit of the legitimate interest of the Data Controller in responding to any requests from customers pursuant to Article 6 (1) (f) of the GDPR.

The processing of Data for the purposes referred to in Article 3 letter C) and D) above has its legal basis in the consent to the processing of Data given by the Data Subject pursuant to Article 6 (1) (a) of the GDPR.

The processing of Data for the purpose referred to in Article 3 letter E) above is necessary for pursuit of the legitimate interest of the Data Controller to make the Data Subject aware of services similar to those already purchased or used by the Data Subject pursuant to Article 6 (1) (f) of the GDPR.

The processing of Data for the purpose referred to in Article 3 letter F) above is necessary for to fulfil a legal obligation to which the Controller is subject under Article 6 (1) (c) of the GDPR.

The processing of Data for the purpose referred to in Article 3 letter G) above is necessary for the pursuit of the legitimate interest of the Data Controller to protect its rights pursuant to Article 6 (1) (f) of the GDPR.

The necessary nature of the provision of Data in order to enjoy the service will be indicated from time to time by an appropriate symbol (\*) next to the information required for the enjoyment of the services

and the purchase of services on the Site. Failure to provide Data indicated as eventual or optional will not result in any limitation or disadvantage to the user.

## **5. Recipients of the Data**

The Data processed by the Data Controller will not be disseminated, i.e. it will not be disclosed to unspecified persons.

The Data may, on the other hand, be disclosed to employees of the Data Controller and to certain external parties that collaborate with it, within the limits of the purposes set out in this policy. Lastly, Data may be communicated to the subjects entitled to access them by virtue of legal provisions, regulations and rules.

The Data may be disclosed, exclusively for the above purposes and limited to what is strictly necessary, to the categories of subjects indicated below:

- (a) persons, companies, associations or professional firms that provide consulting and assistance services and advice to Società Agricola Le Tenute del Leone Alato S.p.A., with particular but not exclusive reference to accounting, administrative, legal, tax and financial matters;
- (b) companies that carry out for Società Agricola Le Tenute del Leone Alato S.p.A., specific technical and organizational services related to the Site (IT Services, CRM and marketing services, management and organization services of Experience bookings, wine order management services), as Data Controller and that have signed a specific contract that duly regulates the processing entrusted to them and the obligations regarding data protection;
- (c) third parties, solely to execute the contract for the purchase of services on the Site (such as the credit institution for the execution of remote electronic payment services by credit/debit card, the company in charge of delivery).

Furthermore, the Data collected may be communicated to public or private entities for the fulfilment of legal obligations.

## **6. Retention period**

Data are kept only for the time necessary to achieve the purposes for which they were collected and to fulfil the legal obligations imposed for the same purposes. In any case, the Data will not be processed for that purpose whose retention period has expired.

For the sake of completeness, the retention times are outlined below in relation to the different purposes listed above:

- for the execution of contractual relationships and consequent obligations: the Data will be retained for the duration of the contract and in any case for no longer than the following 10 years, for tax and accounting purposes;
- for sending commercial communications for advertising and advertising purposes: the Data processed for marketing purposes will be retained until the Data Subject withdraws consent (in any case for a period not exceeding 24 months from the date on which said consent was given for said purpose). Data

processed for profiling purposes will be retained until the Data Subject withdraws consent (in any case for a period not exceeding 12 months from the date on which said consent was provided for that purpose);

- to respond to the Data Subject's requests by sending e-mails to the address in the 'Contacts' section of the Site: the Data will be processed for the time necessary to satisfy the question and/or request;

At the end of the period of Data Processing, the Data shall be deleted or permanently anonymised.

#### **7. Option or obligation to provide Data and consequences of failure to provide Data**

The provision of Data is not compulsory, but failure to provide it will make it impossible for Data Subjects to use the services of the Site.

The provision of Data for the purpose referred to in point 3 letter A), B), C) and D) is optional. However, failure to provide consent means it will be impossible to purchase services, receive commercial communications and/or other marketing materials and/or a response to any requests.

#### **8. Rights of the Data Subject**

In relation to the Data subject to the processing referred to in this policy, the Data Subject has the right at any time of:

- Access: the Data Subject has the right to obtain from the Data Controller confirmation as to whether or not Data relating to him/her are being processed and, to obtain access to the Data and the information referred to in Article 15 of the GDPR, in which case the Data Controller shall provide a copy of the Data being processed. Should the Data Subject request further copies, the Data Controller reserves the right to charge a reasonable fee based on administrative costs;

- Rectification and addition (Article 16 GDPR): the Data Subject has the right to obtain from the Data Controller the rectification of inaccurate Data concerning him/her without undue delay. Taking into account the purposes of the Processing, the Data Subject has the right to supplement incomplete Personal Data, also by providing a supplementary statement;

- Erasure: the Data Subject has the right to obtain from the Data Controller the erasure of the Data concerning him/her without undue delay and the Data Controller has the obligation to erase the Data without undue delay, if one of the grounds set out in Article 17 of the GDPR applies;

- Restriction: the Data Subject has the right to obtain from the Data Controller restriction of processing when one of the cases referred to in Article 18 of the GDPR occurs. If the processing is restricted, the Data are processed, except for storage, only with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or to protect the rights of another natural or legal person or for reasons of substantial public interest of the Union or of a Member State;

- Data portability (Article 20 GDPR);

- Right to object (Article 21 GDPR): The Data Subject has the right to object at any time, for reasons relating to his/her particular situation, to the processing of Data relating to him/her pursuant to

Article 6 (1) (f) of the GDPR, in which case, the Data Controller shall refrain from further processing the Data unless the Data Controller demonstrates the existence of compelling legitimate grounds for processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims;

- Withdrawal of consent (Article 7 (3) GDPR): The Data Subject has the right to withdraw his/her consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before withdrawal. The Data Subject may revoke consent to processing for marketing purposes at any time, either by using the opt-out option found in every marketing communication or by sending an e-mail to [privacy@leonealato.net](mailto:privacy@leonealato.net).

The Data Controller shall provide the Data Subject with information regarding the action taken with respect to a request made by him/her without undue delay and, in any event, no later than one month after receipt of the request. This period may be extended by two months if necessary, taking into account the complexity and the number of requests. The Data Controller shall inform the Data Subject of such extension and the reasons for the delay, within one month of receipt of the request. If the Data Subject submits a request by electronic means, the information shall be provided, where possible, by electronic means, unless otherwise specified by the Data Subject.

#### **9. Methods of exercising rights**

The Data Subject may exercise his/her rights at any time by sending:

- a registered letter with acknowledgement of receipt to Società Agricola Le Tenute del Leone Alato S.p.A., at the registered office in Via Trento, 8, 34132 - Trieste TS;
- an e-mail to [privacy@leonealato.net](mailto:privacy@leonealato.net)

#### **10. Complaint**

The Data Subject also has the right to lodge a complaint with a supervisory authority. For Italy, the supervisory authority is the Italian Data Protection Authority, whose contact details are available at [www.garanteprivacy.it](http://www.garanteprivacy.it).

#### **11. Privacy Policy updates**

This Privacy Policy is subject to occasional revision. If any changes are introduced to the processing, Società Agricola Le Tenute del Leone Alato S.p.A. will update this Privacy Policy. Where required by the applicable legislation, the Data Subject shall be entitled to give his/her consent to any new processing. In case of refusal, the Data Subject's data shall not be processed according to the changes set out in the Privacy Policy.

Last update 27.06.2023