

Privacy Policy of www.hotellory.net

This Application collects some Personal Data of its Users.

This document contains a section dedicated to California consumers and their privacy rights.

This document contains a section dedicated to Users residing in Brazil and their privacy rights.

This document can be printed using the print command present in the settings of any browser.

Data Controller

Marco Poggiani c / o Hotel Lory, Via G. Di Vittorio, 286 53042 Chianciano Terme (Siena)

Owner contact email: info@hotellory.net

Types of data collected

Among the Personal Data collected by this Application, either independently or through third parties, there are: Usage data; Tracking tools; first name; last name; telephone number; province; e-mail; city.

Complete details on each type of data collected are provided in the dedicated sections of this privacy policy or through specific information texts displayed before the data is collected.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically during the use of this Application.

Unless otherwise specified, all data requested by this application are mandatory. If the User refuses to communicate them, it may be impossible for this Application to provide the Service. In cases where this Application indicates some Data as optional, Users are free to refrain from communicating such Data, without this having any consequence on the availability of the Service or on its operation.

Users who have doubts about which data are mandatory are encouraged to contact the owner.

Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless otherwise specified, has the purpose of providing the Service requested by the User, in addition to further purposes described in this document and in the Cookie Policy, if available.

The User assumes responsibility for the Personal Data of third parties obtained, published or shared through this Application and guarantees to have the right to communicate or disseminate them, freeing the Owner from any liability to third parties.

Method and place of processing of the collected data

Processing methods

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification or destruction of Personal Data.

The processing is carried out using IT and / or telematic tools, with organizational methods and with logic strictly related to the purposes indicated. In addition to the Data Controller, in some cases, other subjects involved in the organization of this Application (administrative, commercial, marketing, legal, system administrators) or external subjects (such as suppliers of third party technical services, postal couriers) may have access to the Data. hosting providers, IT companies, communication agencies) also appointed, if necessary, as Data Processors by the Data Controller. The updated list of Managers can always be requested from the Data Controller.

Legal basis of the processing

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

the User has given consent for one or more specific purposes; Note: in some jurisdictions the Data Controller may be authorized to process Personal Data without the User's consent or another of the legal bases specified below, as long as the User does not object ("opt-out") to such treatment. However, this is not applicable if the processing of Personal Data is governed by European legislation on the protection of Personal Data;

the processing is necessary for the execution of a contract with the User and / or for the execution of pre-contractual measures;

the processing is necessary to fulfill a legal obligation to which the Data Controller is subject;

the processing is necessary for the execution of a task of public interest or for the exercise of public authority vested in the Data Controller;

the processing is necessary for the pursuit of the legitimate interest of the Data Controller or third parties.

However, it is always possible to ask the Data Controller to clarify the concrete legal basis of each treatment and in particular to specify whether the treatment is based on the law, provided for by a contract or necessary to conclude a contract.

Place

The Data is processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For more information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than the one in which the User is located. To obtain further information on the place of processing, the User can refer to the section relating to the details on the processing of Personal Data.

The User has the right to obtain information regarding the legal basis for the transfer of Data outside the European Union or to an international organization governed by public international law or consisting of two or more countries, such as the UN, as well as regarding the security measures adopted by the Data Controller to protect the Data.

The User can check if one of the transfers described above takes place by examining the section of this document relating to the details on the processing of Personal Data or request information from the Data Controller by contacting him at the opening details.

Retention period

The Data are processed and stored for the time required by the purposes for which they were collected.

Therefore:

Personal Data collected for purposes related to the execution of a contract between the Owner and the User will be retained until the execution of this contract is completed.

Personal Data collected for purposes related to the legitimate interest of the Data Controller will be retained until this interest is satisfied. The User can obtain further information regarding the legitimate interest pursued by the Owner in the relevant sections of this document or by contacting the Owner.

When the processing is based on the User's consent, the Data Controller may keep the Personal Data longer until such consent is revoked. Furthermore, the Data Controller may be obliged to keep Personal Data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the Personal Data will be deleted. Therefore, at the end of this term the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Purpose of processing the collected data

The User Data is collected to allow the Owner to provide the Service, comply with legal obligations, respond to requests or executive actions, protect their rights and interests (or those of Users or third parties), identify any malicious activities. or fraudulent, as well as for the following purposes: Tag Management, Statistics and Contacting the User.

To obtain detailed information on the purposes of the processing and on the Personal Data processed for each purpose, the User can refer to the "Details on the processing of Personal Data" section.

Details on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Contact the user

Contact form (this Application)

By filling in the contact form with their data, the User consents to their use to respond to requests for information, quotes, or any other nature indicated by the form header.

Personal Data processed: city; last name; e-mail; first name; telephone number; province.

Category of personal information collected under the CCPA: identifiers.

Mailing list or newsletter (this Application)

By registering with the mailing list or newsletter, the User's email address is automatically added to a list of contacts to which email messages containing information, including commercial and promotional information, relating to this Application may be sent. The User's email address may also be added to this list as a result of registering with this Application or after making a purchase.

Personal Data processed: surname; e-mail; first name.

Category of personal information collected under the CCPA: identifiers.

Tag management

This type of service is functional to the centralized management of the tags or scripts used on this Application.

The use of these services involves the flow of User Data through them and, where appropriate, their retention.

Google Tag Manager (Google Ireland Limited)

Google Tag Manager is a tag management service provided by Google Ireland Limited.

Personal Data processed: Usage data; Tracking tools.

Place of processing: Ireland - Privacy Policy.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") within the meaning of the CCPA. In addition to the information contained in this clause, the User can consult the section describing the rights of Californian consumers, for information on how to opt out of the sale.

Statistics

The services contained in this section allow the Data Controller to monitor and analyze traffic data and are used to keep track of User behavior.

Google Analytics (Google Ireland Limited)

Google Analytics is a web analytics service provided by Google Ireland Limited ("Google"). Google uses the Personal Data collected for the purpose of tracking and examining the use of this Application, compiling reports and sharing them with other services developed by Google.

Google may use the Personal Data to contextualize and personalize the advertisements of its own advertising network.

Personal Data processed: Usage data; Tracking tools.

Place of processing: Ireland - Privacy Policy - Opt Out.

Category of personal information collected under the CCPA: Internet information.

This type of processing constitutes a "sale of data" ("sale") within the meaning of the CCPA. In addition to the information contained in this clause, the User can consult the section describing the rights of Californian consumers, for information on how to opt out of the sale.

User rights

Users can exercise certain rights with reference to the Data processed by the Data Controller.

In particular, the User has the right to:

withdraw consent at any time. The User can revoke the consent to the processing of their Personal Data previously expressed.

oppose the processing of their data. The user can oppose the processing of their data when it occurs on a legal basis other than consent. Further details on the right to object are indicated in the section below.

access their data. The User has the right to obtain information on the Data processed by the Data Controller, on certain aspects of the processing and to receive a copy of the Data processed.

verify and request rectification. The User can verify the correctness of their Data and request its updating or correction.

obtain the limitation of the treatment. When certain conditions are met, the User may request the limitation of the processing of their Data. In this case, the Data Controller will not process the Data for any other purpose other than their conservation.

obtain the cancellation or removal of their Personal Data. When certain conditions are met, the User can request the cancellation of their Data by the Owner.

receive their data or have them transferred to another owner. The User has the right to receive his / her Data in a structured format, commonly used and readable by an automatic device and, where technically feasible, to obtain its unhindered transfer to another owner. This provision is applicable when the Data is processed with automated tools and the processing is based on the User's consent, on a contract to which the User is a party or on contractual measures connected to it.

propose a complaint. The User can lodge a complaint with the competent personal data protection supervisory authority or take legal action.

Details on the right to object

When Personal Data are processed in the public interest, in the exercise of public authority vested in the Owner or to pursue a legitimate interest of the Owner, Users have the right to object to the processing for reasons related to their particular situation.

Users are reminded that, if their Data are processed for direct marketing purposes, they can oppose the processing without providing any reasons. To find out if the Data Controller processes data for direct marketing purposes, Users can refer to the respective sections of this document.

How to exercise your rights

To exercise the User's rights, Users can direct a request to the contact details of the Owner indicated in this document. Requests are filed free of charge and processed by the Data Controller as soon as possible, in any case within one month.

Further information on the treatment

Defense in court

The User's Personal Data may be used by the Owner in court or in the preparatory stages for its eventual establishment for the defense against abuse in the use of this Application or related Services by the User.

The User declares to be aware that the Owner may be obliged to disclose the Data by order of the public authorities.

Specific information

At the request of the User, in addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information regarding specific Services, or the collection and processing of Personal Data.

System log and maintenance

For needs related to operation and maintenance, this Application and any third party services used by it may collect system logs, which are files that record the interactions and which may also contain Personal Data, such as the User IP address.

Information not contained in this policy

More information in relation to the processing of Personal Data may be requested at any time from the Data Controller using the contact details.

Response to "Do Not Track" requests

This Application does not support "Do Not Track" requests.

To find out if any third-party services used support them, the User is invited to consult the respective privacy policies.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, if possible, on this Application as well as, if technically and legally feasible, by sending a notification to Users through one of the extremes of contact he has. Please therefore consult this page frequently, referring to the date of the last modification indicated at the bottom.

If the changes affect treatments whose legal basis is consent, the Data Controller will collect the User's consent again, if necessary.

Information for Californian consumers

This part of the document integrates and completes the information contained in the rest of the privacy policy and is provided by the company that manages this Application and, where applicable, by its parent company and its subsidiaries and affiliates (for the purposes of this section collectively referred to as "we", "our" or "our").

The provisions contained in this section apply to all Users who are considered consumers resident in the state of California, United States of America, pursuant to the "California Consumer Privacy Act of 2018" (such Users are referred to below simply as "you", "Your", "you" or "your"), and, for them, these provisions prevail over any other divergent or conflicting provision contained in this privacy policy.

This part of the document uses the term "personal information" as defined by the California Consumer Privacy Act (CCPA).

Categories of personal information collected, disclosed or sold

This section summarizes the categories of personal information that we have collected, communicated or "sold" pursuant to the CCPA and the related purposes of the processing. You can find detailed information on these activities in the section entitled "Details on the processing of Personal Data" in this document.

Information We Collect: The categories of personal information we collect

We have collected the following categories of personal information about you: identifiers and information on the Internet.

We will not collect additional categories of personal information without first communicating a new policy to you.

How we collect information: What are the sources of the personal information we collect?

We collect the above categories of personal information, directly or indirectly, from you when you use this Application.

For example, you provide us with your personal information directly when you submit requests through any form on this Application. Furthermore, you indirectly provide us with personal information when you browse this Application, as the personal information concerning you is automatically observed and collected. Finally, we may collect your personal information from third parties who work with us in connection with the provision of the Service or the operation of this Application and its features.

How we use the information collected: sharing and communicating your personal information with third parties for operational purposes.

We may disclose your personal information to third parties for operational and service purposes. In this case, we enter into a written contract with that third party which obliges the recipient of your personal information to keep such information confidential and not to use it for purposes other than those necessary for the performance of the contract.

We may also disclose your personal information to third parties when you ask us or authorize us to do so in order to provide you with our Service.

For more information on the purposes of the processing, please consult the relevant section of this document.

Sale of your personal information

For the purposes of this document, the term "sale" means "sell, transfer, release, make public, disclose, disseminate, make available, transfer or otherwise communicate orally, in writing or by electronic means, personal information of a consumer by a company to another company or to third parties, for consideration or for another type of profit".

This means that, for example, a sale can take place whenever an application publishes advertisements, performs statistical analysis on its traffic or visualizations or, simply, you use tools such as social network plug-ins and similar tools.

Your right to opt out of the sale of your personal information

You have the right to opt out of the sale of your personal information. This means that whenever you ask us not to sell your data, we will execute your request.

Such requests can be made freely, at any time, and without submitting any request subject to verification, simply by following the instructions below.

Instructions for opting out from the sale of personal information

If you wish to have further information or to exercise your right to opt-out in relation to all sales made by this Application, both online and offline, you can contact us using the contact details provided in this document.

What are the purposes for which we use your personal information?

We may use your personal information to allow the proper functioning of this Application and its functions ("operational purposes"). In such cases, your personal information will be processed in an appropriate and proportionate manner to the purposes for which it was originally collected and strictly within the limits of compatible purposes.

We may also use your personal information for other reasons, such as for commercial purposes (as indicated in the "Details on the processing of Personal Data" section of this document), as well as to comply with the law and defend our rights. before the competent authorities when our rights or interests are threatened or when we suffer damage.

We will not use your personal information for any other, unrelated or incompatible purpose without first communicating a new policy to you.

Your California Privacy Rights and How to Exercise Them

Right to knowledge and portability

You have the right to know the following:

the categories of personal information we collect about you and the sources of that information, the purposes for which we use your personal information and who we share it with;

in the event of the sale or disclosure of personal information to third parties for operational purposes, we will provide you with two separate lists in which we will notify you:

for sale, the categories of personal information communicated to each category of recipients; And

for communication to third parties for operational purposes, the categories of personal information obtained from each category of recipients;

The above information will be limited to personal information collected or used in the past 12 months.

In the event that our response is provided electronically, the information contained therein will be "portable", i.e., delivered in a compatible format so that you can transmit the information to other entities without hindrance - provided this is technically feasible.

Right to request the deletion of your personal information

You have the right to request the deletion of any of your personal information, subject to the exceptions provided by law (such as, by way of example and not limited to, in the event that the information is used to identify and repair errors on this Application, to detect incidents security, for the purpose of protection from fraudulent or illegal activities, to exercise certain rights, etc.).

If no exception provided by law applies, following the exercise of your right, we will delete your personal information and ask our suppliers to do the same.

How to exercise your rights

To exercise the rights described above, you must submit a verifiable request by contacting us using the contact details provided in this document.

To respond to your request, it is necessary for us to be able to identify you. For this you can exercise the above rights only by submitting a verifiable request which must:

provide sufficient information to enable us to reasonably verify that you are the person to whom the personal information we have collected relates or an authorized representative;

describe your request with a degree of detail that is sufficient to make us understand, evaluate and respond correctly to what you ask us.

We will not respond to any requests if we are unable to verify your identity and, therefore, to confirm that the information in our possession actually refers to you.

If you cannot personally submit a verifiable request, you can delegate a person registered with the California Secretary of State to do so on your behalf.

If you are an adult, you can make a verifiable request on behalf of whoever falls under your parental authority.

A maximum of 2 requests can be submitted within 12 months.

How and in how long will we handle your request

Within 10 days we will confirm that we have received your request and provide you with information on how we will process it.

We will respond on the merits of the request within 45 days of receiving it. If we need more time, we will explain why and let you know how much time we need. In this regard, please note that it may take up to 90 days to fulfill your request.

Our communications will cover the period of the previous 12 months.

Should we deny your request, we will explain the reason for the denial.

We will not charge any fees to process or respond to your verifiable request unless it is manifestly unfounded or excessive. In such cases, we may apply a reasonable fee, or deny the request. In both cases, we will notify you of our decisions and explain the reasons.

Information for Users residing in Brazil

This part of the document integrates and completes the information contained in the rest of the privacy policy and is provided by the entity that manages this Application and, where applicable, by its parent company and its subsidiaries and affiliates (for the purposes of this section collectively referred to as "we", "our" or "our").

The provisions contained in this section apply to all Users who are resident in Brazil, pursuant to "Lei Geral de Proteção de Dados" (such Users are referred to below simply as "you", "your", "you" or "your"). For such Users, these provisions prevail over any other divergent or conflicting provision contained in this privacy policy.

In this part of the document, the term "personal information" is used as defined by Lei Geral de Proteção de Dados (LGPD).

Legal basis under which we process your personal information

We only process your personal information if one of the legal bases for such processing exists. The legal bases are as follows:

your consent to the processing activities in question;

compliance with legal obligations that we are required to meet;

the execution of rules dictated by laws or regulations or by contracts, agreements or other similar legal instruments;

studies conducted by research organizations, preferably carried out on anonymised personal information;

the execution of a contract and related pre-contractual obligations, if you are a party to that contract;

the exercise of our rights in court, in administrative procedures or in arbitration;

the defense or physical safety of you or a third party;

health protection - in the context of procedures put in place by entities or health professionals;

our legitimate interest, provided that your fundamental rights and freedoms do not override those interests; And

credit protection.

To find out more about the legal bases, you can contact us at any time using the contact details provided in this document.

Categories of personal information processed

To find out which categories of personal information are processed, you can refer to the section "Details on the processing of Personal Data" in this document.

Why we process your personal information

To find out why we process your personal information, please refer to the sections "Details on the processing of Personal Data" and "Purpose of the Processing of Collected Data" in this document.

Your privacy rights in Brazil, how to submit a request and how it will be handled by us

Your privacy rights in Brazil

You have the right to:

obtain confirmation of the existence of processing activities regarding your personal information;

access your personal information;

obtain the rectification of your incomplete, inaccurate or outdated personal information;

obtain anonymization, blocking or deletion of unnecessary or excessive personal information, or information that is processed contrary to the provisions of the LGPD;

obtain information regarding the possibility of giving or refusing your consent and the related consequences;

obtain information about the third parties with whom we share your personal information;

obtain, upon your explicit request, the portability of your personal information (with the exception of anonymised information) to other suppliers of products or services, provided that our trade and industrial secrets are safeguarded;

obtain the deletion of personal information processed if the processing was carried out on the basis of your consent, unless one or more of the exceptions previews of article 16 LGPD;

withdraw your consent at any time;

submit a complaint regarding your personal information to the ANPD (National Data Protection Authority) or to a consumer protection body;

oppose processing activities in cases where such processing is not carried out in accordance with the provisions of the law;

request clear and adequate information regarding the criteria and procedures used in the context of automated decision-making processes; And

request the review of decisions that harm your interests, made exclusively on the basis of automated decision-making processes of your personal information. These include decisions to outline your personal, professional, consumer or creditor profile, or other aspects of your personality.

You will never be discriminated against, nor will you suffer in any way any treatment that is unfavorable to you, following the exercise of your rights.

How to submit a request

You can make an explicit request to exercise your rights free of charge, at any time, using the contact details in this document or through your legal representative.

How and in how long will we handle your request

We will do our best to respond to your request as soon as possible.

In any case, if it is impossible for us to do so, we will make sure to inform you of the factual or legal reasons that prevent us from immediately satisfying or following up on your request. If your personal information is not processed by us, if we are able to do so, we will indicate the natural or legal person to whom to address your requests.

In the event that you decide to submit an access request or a request for confirmation of the existence of the processing of personal information, please make sure to specify whether you prefer to receive your personal information in electronic or paper format.

You will also need to let us know if you would like an immediate response, in which case you will receive a simplified response, or if you need complete information instead.

In the latter case, we will respond within 15 days from the moment of your request, providing you with all the information regarding the origin of your personal information, the confirmation or not of the existence of personal information concerning you, all the criteria used for the processing, and the purposes of such processing, while safeguarding our trade and industrial secrets.

In the event that you decide to submit a request for rectification, deletion, anonymization or blocking of personal information, we will make sure to immediately inform the other parties with whom we have shared your personal information of your request so that they can in turn fulfill your request - except in cases where such communication is impossible or excessively burdensome for us.

Transfer of personal information outside of Brazil in cases permitted by law

We may transfer your personal information outside of Brazilian territory in the following cases:

when the transfer is necessary for international legal cooperation between intelligence services, investigative and criminal procedure bodies, as required by the tools made available by international law;

when the transfer is necessary to defend your life or physical safety or that of third parties;

when the transfer is authorized by the ANPD;

when the transfer derives from an obligation assumed in the context of an international cooperation agreement;

when the transfer is necessary for the exercise of public order or for the performance of a public service;

when the transfer is necessary for the fulfillment of a legal obligation, the execution of a contract and related pre-contractual obligations, or the normal exercise of rights in management, administration or arbitration.

Definitions and legal references

Personal Data (or Data)

Any information that, directly or indirectly, also in connection with any other information, including a personal identification number, makes a natural person identified or identifiable constitutes personal data.

Usage Data

This is the information collected automatically through this Application (also from third-party applications integrated into this Application), including: the IP addresses or domain names of the computers used by the User who connects with this Application, the addresses in URI notation (Uniform Resource Identifier), the time of the request, the method used in forwarding the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.) country and origin, the characteristics of the browser and operating system used by the visitor, the various temporal connotations of the visit (for example the time spent on each page) and the details of the

itinerary followed within the Application, with particular reference the sequence of the pages consulted, the parameters relating to the operating system and the IT environment of the User.

User

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

Interested

The natural person to whom the Personal Data refers.

Data Processor (or Manager)

The natural person, legal person, public administration and any other body that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, service or other body which, individually or together with others, determines the purposes and means of the processing of personal data and the tools adopted, including the security measures relating to the operation and use of this Application. The Data Controller, unless otherwise specified, is the owner of this Application.

This Application

The hardware or software tool through which the Personal Data of Users are collected and processed.

Service

The service provided by this application as defined in the relative terms (if available) on this site / application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union contained in this document is intended to be extended to all current member states of the European Union and the European Economic Area.

Cookies

Cookies are Tracking Tools which consist of small pieces of data stored in the User's browser.

Tracking Tool

By Tracking Tool we mean any technology - eg. Cookies, unique identifiers, web beacons, integrated scripts, e-tags and fingerprinting - which allow users to be tracked, for example by collecting or saving information on the User's device.

Legal references

This privacy statement is drawn up on the basis of multiple legislative systems, including articles. 13 and 14 of Regulation (EU) 2016/679.

Unless otherwise specified, this privacy statement only concerns this Application.

Last modification: August 24, 2022