

Privacy Statement and Cookie Policy

Version 1.0

Bressanone Turismo Soc. Coop. having registered office in Viale Ratisbona 9, 39042 Bressanone (hereafter Bressanone Turismo Soc. Coop.) is committed to protecting the online privacy of users. Pursuant to art. 13 of EU Regulation 2016/679 (hereafter: "**Regulation**"), this statement was written to inform you on our privacy policy and how your personal data is handled when you visit our website (hereafter "Website"), as well as to enable you to give your specific and informed consent to the processing of your Personal Data, where applicable. Please be informed that parental consent is required for children under 16 years of age. The information and data provided by you, or otherwise acquired through use of our online services (hereafter "**Services**") on your part, will be processed in compliance with the Regulation and the Data Controller's obligation to confidentiality.

Pursuant to the Regulation, Bressanone Turismo Soc. Coop. shall process Personal Data based on the principles of lawfulness, fairness, transparency, limitation of purpose and retention, data minimisation, accuracy, integrity and confidentiality.

TABLE OF CONTENTS

1. **Data Controller**
2. **Personal Data subject to processing**
 - a. **Browsing data**
 - b. **Special categories of Personal Data**
 - c. **Data volunteered by Data Subjects**
3. **Purposes of data processing**
4. **Lawful basis and mandatory or optional nature of data processing**
5. **Disclosure of Personal Data**
6. **Transfer of Personal Data**
7. **Retention of Personal Data**
8. **Your rights**
9. **Changes**

1. Data Controller

In relation to the data processing carried out through our website, the Data Controller as defined above is Bressanone Turismo Soc. Coop. For any information regarding the processing of Personal Data by the Data Controller, including the list of Data Processors, please write to the following address: info@brixen.org

2. Personal Data subject to processing

Please be informed that as a result of website browsing, the Data Controller will collect and process Personal Data that may consist of information like name and surname, identification number, online identifier, mail address, e-mail address, landline and/or mobile telephone number or information on one or more physical, physiological, psychological, financial, cultural or social features relating to an identified or identifiable person (hereafter "**Personal Data**").

The following Personal Data is processed through our Website:

a. Browsing data

During normal operation, the computer systems and software used to operate our Website acquire some Personal Data the transmission of which is implicit in the Internet communication protocols. The collection of this information is intended to be associated with identified parties; however, the data collected might by its nature allow users to be identified through processing and association with data held by third parties. This category of data includes IP addresses or domain names of computers used by users who connect to the Website, URI (Uniform Resource Identifier) of requested resources, the time of request and method used to submit it to the server, the size of the file obtained in reply, the numerical code indicating the server response status (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. This data is used for the sole purpose of obtaining anonymous statistical information on the use of the Website and to ensure its correct functioning by identifying any anomalies and/or abuses, and are

therefore deleted immediately after processing. The data could be used to ascertain responsibility in the event of possible computer crimes against the Website or third parties; except for this possibility, the data collected from the Website is removed within a short period of time.

b. Special categories of Personal Data

If you send us your application via e-mail or through our website, you might provide us with Personal Data that falls within special categories as set forth in art. 9 of the Regulation, namely: "[...] personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and [...] genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation". Please do not disclose this type of data unless it is strictly necessary. Please be informed that if you do choose to provide this type of data without giving your specific consent to the processing (e.g. by sending a CV), the processing on our part will relate to data made manifestly public by the Data Subject, as provided for by art. 9(1)(e) of the Regulation. Therefore, the Data Controller will be released from any liability or dispute whatsoever in connection with the processing of such data. As previously mentioned, explicit consent to the processing of special categories of Personal Data is fundamental if you do choose to disclose such information.

Please be also informed that the Data Controller may view any social media profiles made openly available on professional networking sites or platforms (e.g. LinkedIn).

c. Data volunteered by Data Subjects

We may process Personal Data of third parties that you send to the Data Controller when using certain services on our Website (e.g. the request/contact/booking forms). In these cases, you act as independent Data Controller, thereby assuming all the obligations and liabilities set by law. In this sense, you release the Data Controller from any and all responsibilities and obligations with respect to any dispute, claim, compensation for damages etc. that may be received from third parties whose Personal Data has been processed through the Website functions in violation of applicable data protection laws. In any case, if you provide or process Personal Data of third parties while using our Website, you warrant – assuming full liability – that processing has a lawful basis in compliance with art. 6 of the Regulation.

3. Purposes of data processing

If necessary and with your specific consent, we will process your Personal Data for the following purposes:

- a.** Provide the services you require;
- b.** Respond to requests for assistance, information or bookings;
- c.** View CVs and contact applicants;
- d.** Comply with legal and tax obligations;
- e.** Marketing purposes: the data provided may be used, subject to explicit and specific consent, for the sending of promotional and marketing communications, including newsletters and market surveys, using automated tools (SMS, MMS, e-mails, push notifications) and non-automated tools (paper mail, telephone calls by operators). The lawful basis for the processing of your data for these purposes is art. 6, paragraph 1, letter a) of the Regulation. The processing of data for direct marketing is optional and based exclusively on your free choice, and denying your consent for this purpose will not affect the use of services on your part.

4. Lawful basis and mandatory or optional nature of data processing

The lawful basis for the processing of Personal Data for the purposes referred to in section 3 (a-b-c) is art. 6(1)(b) of the Regulation (performance of a contract) as the data is necessary to provide the services required and/or to respond to requests from the interested party. Giving your Personal Data for these purposes is optional, but indispensable to activate the services provided by the Website, to answer requests or evaluate CVs. With specific reference to the purpose 3.c and the viewing of profiles on professional networking platforms made freely available on the Internet, as mentioned in section 2.b, the lawful basis is art. 6(1)(f) of the Regulation, i.e. the legitimate interest of the holder in verifying the candidate's suitability for the open position and any potential risks.

For the purposes illustrated in section 3.d, the lawful basis is art. 6(1)(c) of the Regulation (compliance with legal obligations). Once provided, Personal Data must be processed for the Data Controller to comply with legal obligations.

Art. 6(1)(a) of the Regulation (your consent) is the lawful basis for the processing of data for the purposes referred to in section 3.e. In this respect, activities that involve the direct sending of advertising material, direct sales or market surveys and commercial communications in relation to products or services similar to those you purchased, the Data Controller may use your e-mail and mail addresses without your consent, in accordance with and within the limits allowed by art. 130, paragraph 4 of the Italian Data Protection Code and the by the Decision of the Italian Data Protection Authority of 19 June 2008. The lawful basis for the processing of your data for this purpose is Art. 6(1)(f) of the Regulation (legitimate interest).

5. Disclosure of Personal Data

For the purposes listed in section 3, your Personal Data may be shared with:

- a.** Parties who typically act as Data Processors, namely: i) persons and/or organisations providing us assistance and counselling services on marketing and communication; ii) persons and/or organisations who assist us in providing certain services (e.g. hosting providers) iii) persons and/or organisations who perform technical maintenance activities (including maintenance of network equipment and electronic communication networks); (collectively, "**Recipients**");
- b.** Persons, entities or authorities to whom Personal Data must be disclosed by virtue of legal provisions or orders given by a competent authority;
- c.** Parties authorised by the Data Controller to perform activities that are strictly related to the provision of services or for the purposes listed in section 3, who have committed themselves to confidentiality or have legal obligation to confidentiality (e.g. employees).

6. Transfer of Personal Data

Some of your Personal Data is shared with Recipients who may be located outside the European Economic Area. The Data Controller ensures that these Recipients process your Personal Data in compliance with the Regulation. Transfer of Personal Data may be based on an adequacy decision, on Standard Contractual Clauses approved by the European Commission or on another appropriate legal basis. For further information please contact the Data Controller by sending an e-mail to: info@brixen.org

7. Retention of Personal Data

Personal Data processed for the purposes referred to in section 3(a-b) will be kept only for as long as strictly necessary to achieve those purposes. In any case, since data is used in order to provide services, the Data Controller will process the Personal Data up to the time allowed by Italian law (art. 2946 of the Italian Civil Code and subsequent amendments). With regard to any CVs submitted through the Website or by e-mail (see section 3.c), the Personal Data will be kept for as long as necessary for the purpose. The Data Controller may contact the candidate again shortly before the indicated deadline to ask for an extension of the retention period.

Personal Data processed for the purposes referred to in section 3(d) will be stored for as long as provided for by applicable laws and regulations.

Personal Data processed for the purposes referred to in section 3(e) will be kept until we have consent; if you do not withdraw your consent, your data will be stored for a time deemed appropriate.

For more information on our data retention policy and criteria, please contact: info@brixen.org

8. Your rights

Pursuant to Art. 15 and following of the Regulation, you have the right to obtain access to your Personal Data at any time. You have the right to request from the Data Controller rectification or erasure of your data, as well as to object to and restrict processing of your data in the cases provided for by Art. 18 of the Regulation. You have the right to obtain the Personal Data concerning you in a structured, commonly used and machine-readable format in compliance with Art. 20 of the Regulation.

Requests must be submitted in written form and sent at: info@brixen.org

In any case, you also have the right to lodge a complaint with the competent Supervisory Authority (Italian Data Protection Authority) if you consider that the processing of your Personal Data infringes the applicable law, pursuant to Art. 77 of the Regulation.

9. Changes

This Privacy Policy takes effect on 5-25-2018. The Data Controller reserves the right to amend or update the content of this policy, in part or in full, especially in the case of changes in the applicable law. Since the content of our Website and Privacy Policy may be subject to change, we recommend you visit this section regularly for updates on how we collect and use Personal Data.