

## **Privacy [www.sacra.it](http://www.sacra.it)**

### **Pursuant to [Italian] Legislative Decree no. 196/2003 art. 13**

#### **HANDLING PERSONAL DATA**

Pursuant to [Italian] Legislative Decree no. 196/2003, art. 13, containing provisions for the safeguard of people and other subjects with regard to handling of personal data, the SACRA spa sede legale via Pietro Maestri, 2 - 20129 Milano Italy (hereinafter "SACRA"), provides concerned persons with due information on the possible handling of personal data collected, which may be used to do whatever is necessary and instrumental to establishing and executing a number of informative and contractual relations. Personal data is where handled in compliance with the current legislation and SACRA's privacy policy.

#### **1. SOURCES OF PERSONAL DATA**

SACRA normally collects personal data from the concerned person or from third parties.

#### **2. SENSITIVE DATA**

For the purpose of establishing normal contractual relationships, SACRA does not handle "sensitive data" pursuant to [Italian] Legislative Decree no. 196/2003. Where, for any reason, SACRA finds itself in a position whereby it has to handle sensitive personal data belonging to third parties, to guarantee the best service, the data will be handled, with express written consent, within the bounds and limits of [Italian] Legislative Decree no. 196/2003.

#### **3. PURPOSE FOR HANDLING DATA**

Personal data of visitors of this site that forward booking requests are used only to carry out the service or the booking and are communicated to third parties only in authorized and necessary. The visitors that use request forms for booking and registration to the e-newsletter will have to communicate personal data (name, surname, address, email address, telephone number, etc) and authorize the handling. Without the consent for handling personal data SACRA will not be able to receive requests for bookings and/or for e-newsletter services. Data collected for this service will not be communicated or released without the consent of the concerned person.

#### **4. METHOD FOR HANDLING DATA**

Personal data collected by SACRA is done in a lawful and fair manner, using electronic or automatic apparatus or paper, and in any case using methods that guarantee the safety and confidentiality of the data itself. Data collection is performed by people specially appointed pursuant to [Italian] Legislative Decree no. 196/2003. The data is stored so that the concerned person can be identified for a period of time no longer than that necessary for the purposes for which the data was collected and stored.

#### **5. SCOPE OF COMMUNICATION AND DIVULGENCE**

SACRA may communicate the personal data in its possession to the categories indicated below, who will treat them as Licensees or Responsible Parties, pursuant to [Italian] Legislative Decree no. 196/2003:

- to GROUP companies, who are reported to handle data in compliance with the current legislation. Such communication, permitted under [Italian] Legislative Decree no. 196/2003, does not require consent;
- to pursue contractual obligations, where required by law, regulations and EU legislation, to Italian public Administrations and Bodies, supervisory and control Authorities and bodies, tax centres, Judicial Bodies, professionals, and professional associations. Such communications, permitted under [Italian] Legislative Decree no. 196/2003, do not require consent;
- for purely instrumental purposes and/or additional purposes for execution of the contract and/or carrying out of related performances, credit and insurance institutions; corporate consultation companies; information technology service companies, data and document storage companies; credit recovery agencies and other services; customer satisfaction survey companies; statistics and data processing companies, marketing and advertising companies. For such communications, the consent of the concerned person is required, and failure to do so may limit the contractual relationship and/or operations of SACRA.

The concerned person may, at any time and freely, receive updated information about the list of addressee companies. Subjects belonging to these categories act as external Responsible Parties for data handling, or they operate autonomously as individual licensees of data handling. Additional communication or divulgence may only occur with express consent from the concerned person.

#### **6. PROVIDING DATA**

Providing data is optional. Without them, SACRA may find itself in a position whereby it is unable to provide the information requested and services necessary to fulfil its contractual, accounting and tax obligations. Moreover it is to be noted that any non-communication or erratic communication of one of the obligatory information, may lead to: impossibility for the licensee to guarantee the suitability of the data handling process pursuant to the contractual conditions for which it was provided; possible inconsistency of the data

handling results with fiscal, administrative or business obligations for which it was required. You are entitled to exercise your rights pursuant to [Italian] Legislative Decree no. 196 art. 7, 8, 9 and 10, by contacting the handling licensee.

#### 7. DATA GIVEN BY THE CLIENT

The optional forward, unequivocal and intentional of information by email or with the request form to this site's addresses, entails the acquisition of the sender's address, necessary to reply to the requests, and of all the other information included in the in the form filled in by the visitor of the site. Specific disclosures will be displayed in the website's pages arranged for request services.

#### 8. CONFERRING CONSENT

In compliance with [Italian] Legislative Decree no. 196/2003, art. 24, consent is not necessary when, in the course of the company's ordinary business, data is handled in the execution of a request or contract or in a pre-contractual stage; when data is handled to execute a legal obligation; when the data is collected from public registers and lists; when the data pertains to the economy activity of the concerned person.

#### 9. CONCERNED PERSON'S RIGHTS

Pursuant to art. 7: The concerned party has the right to obtain confirmation of the existence or non-existence of personal data that pertains to him or her, even if it is not yet registered, with the data reported in intelligible form. The concerned person has the right to obtain information regarding:

- the origin of personal data;
  - the purpose for collection and handling methods;
  - the logic applied while handling the data with the help of electronic instruments;
  - information identifying the licensee, parties responsible and nominated representatives pursuant to art. 5 paragraph 2;
  - subjects and categories to whom personal data may be communicated or that may come into knowing as nominated representatives in the State territory, responsible or appointed parties; The concerned persons have the right to: Update, correct or if they choose, add data;
  - cancel, change to anonymous or block data handled in violation of the law, including data that does not need to be kept in relation to the purposes for which the data was collected or later handled;
  - certification that the operations contained in a) and b) have been brought to the knowledge, even with regard to their content, to those parties to whom data has been communicated or divulged, excluding cases where doing this is impossible or entails the use of means clearly disproportionate to the right protected;
- The concerned person has the right to oppose entirely or in part:
- For legitimate reasons, to the treatment of personal data concerning him or her, even if pertinent to the purpose of the collection;
  - to the handling of personal data pertinent to him or her for the purpose of sending advertising material or direct sales or to carry out market research or marketing communications.

#### 10. LICENSE

The personal data provided will be stored at the offices of the company SACRA, located in Strada Litoranea, Burano 17 – 58011 Capalbio (Gr) Italy. Personal data provided may be transferred abroad, within the European Union, in compliance and within the limits contained in [Italian] Legislative Decree no. 196/2003 art. 42. Personal data may be transferred abroad in countries outside the EU within the scope and limitations contained in [Italian] Legislative Decree no. 196/2003 art. 44 b). In this regard, the company SACRA works exclusively with persons who adhere to "The Safe Harbour Privacy Principle".

The Licensee handling personal data as set out in this disclosure is SACRA, located in Strada Litoranea, Burano 17 – 58011 Capalbio (Gr) Italy, in the person of the legal representative protempore, who may be contacted with regard to any request for clarifications and/or information.

#### IN GENERAL

Personal data will be handled for institutional purposes, connected to SACRA's activity: to carry out a service for one or more operations arranged by the contract: to carry out, in general, law obligations; for SACRA's operative and management requirements, in particular, but not only, for SACRA's accounts revision; subject to explicit approval of the client: to have information on the client's tastes and preferences regarding journeys, stays, SPA wellness treatments and demographic information such as year of birth, gender, nationality, spoken language, marital status, family unit, with the aim to give a personalized and quality service; to give information regarding products and services offered by SACRA or by his partners or other opportunities that could be interesting for the client; to process statistics on sales, clients and other information, and to communicate these statistics to third parties. The statistics will not include information that can determine the identification of the client (without his explicit approval).

#### COOKIES

Cookies are small files sent by the user's browsers and kept in their computers' hard disk. When a user registers on SACRA's website his computer records an identification code (Cookie) that will save the user putting in again his email address every time he visits the website. SACRA informs that the user's password and other information contained in the Cookies will not be used in other ways.