

PRIVACY POLICY FOR THE WEBSITE WWW.MIDENZA.COM

On this page, Fratelli Naso S.n.c. di Naso Francesco e Antonio ("Midenza") explains how it handles data for the users who visit its website and the behaviour of the cookies its site installs.

This Privacy Policy is provided in compliance with article 13 of GDPR 2016/679 (General Data Protection Regulation, the European regulation on the protection of personal data), the Guidelines of the Garante Privacy of 10. June 2021, the Guidelines EDPB 5/2020 on consent, the ECJ Judgment 1 October 2019 C-673/17, the general Act of the Garante Privacy [the Italian Data Protection Authority] on cookies no. 229 of 8 May 2014, the Working Document 02/2013 providing guidance on obtaining consent for cookies", the opinion of WP 29 no. 4/2012 on cookie consent exemption, the Directive 2002/58/EC, the Recommendation no. 2/2001 by the Workgroup under article 29.

The following information applies only to the site www.midenza.com; the data controller is not responsible for any data entered or cookies installed by other sites that may be consulted using links.

Information on the data controller

The data controller is Midenza, with legal offices at Loc. Tono, I-89865 Capo Vaticano (VV) Italy. To exercise your rights under the regulations, you can contact the data controller at his/her office or sending an email to info@midenza.com.

Purpose and legal basis for data processing

The Midenza handles data provided by the user through the site for the following purposes:

a. Fulfilment of obligations established by law, by regulations, or by community regulations

The provision of data for this purpose is mandatory and the legal basis for processing it is the fulfilment of a legal obligation to which the data controller is subject, as established by article 6, paragraph 1c of the GDPR. The processing of personal data for these purposes does not require the user's consent. The processed data will be kept for the time foreseen by the referenced legislation.

b. Statistical analysis on aggregate or anonymous data

This processing doesn't allow for the identification of the user, but simply wants to verify the adequacy of adopted web marketing campaigns and/or the correct functioning of the site, measuring user traffic generated. The processing of aggregate or anonymous data, which does not allow for the identification of the user, does not fall within the scope of the application of the law on the protection of personal data and therefore no consent is required for its processing.

c. Request for information, contact and support

The provision of the requested data is necessary to provide feedback to your request. The legal basis of the processing is indicated by Article 6 paragraph 1b of the GDPR, and it is the execution of a contract of which the interested party is party to or the execution of pre-contractual measures adopted at the request of the same, as well as by Article 6 paragraph 1f, and is the pursuit of a legitimate interest of the data controller or third parties. The data processed and relating to your request will be kept by us for three years.

d. Access to the restricted area

The provision of the requested data is necessary in order to allow you access to the reserved area and to manage some preparatory aspects to the eventual reservation (e.g. pre-check-in), the use of the services available through digital concierge as well as the phase of conclusion of the stay (check-out). The legal basis of the processing is indicated by Article 6 paragraph 1b of the GDPR, and it is the execution of a contract of

which the interested party is a party or the execution of pre-contractual measures adopted at the request of the same. The data processed and related to your registration will be kept by us until your cancellation and unsubscribe request.

e. Newsletter and other promotional communications

The provision of the data required to register for our newsletter and/or to send you communications and promotional materials is entirely optional and the legal basis for this treatment is the express consent of the data subject to the processing of his/her personal data. If specific consent is given, your personal data may also be for further promotional purposes, including by means other than e-mail. The data processed for the purposes of sending newsletters will be kept until you request to unsubscribe, while for further promotional and marketing purposes will be kept by us for 3 years, unless you renew your consent to the processing given.

f. Availability and quote requests, booking and reservations

The provision of the data requested is necessary to provide feedback to your inquiry and proceed with the eventual reservation of the chosen stay. The legal basis of the processing is indicated by Article 6 paragraph 1b of the GDPR, and it is the execution of a contract of which the interested party is a part or the execution of pre-contractual measures adopted at the request of the same, as well as by Article 6 paragraph 1f, and is the pursuit of a legitimate interest of the data controller or third parties. The data processed and related to your request will be kept by us, in the event of a reservation, for the time required by civil, accounting, and tax laws (10 years) or alternatively, in the case of simple request for availability/quote, for 3 years.

g. Survey of customer satisfaction

During the stay, requests may be sent to you aimed at collecting the guest's judgment and satisfaction. This processing is based on 'Article 6 paragraph 1 letter b) of the GDPR, and is 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. The data referring to this processing will be kept for one year.

h. Click to pay

The provision of the requested data is necessary to complete the requested payment. The legal basis of the treatment is indicated by Article 6 paragraph 1b of the GDPR, and is the execution of a contract of which the interested party is part or the execution of pre-contractual measures adopted at the request of the same. The data processed and related to your request will be kept by us for the time required by civil, accounting, and tax law which amounts to 10 years.

i. Gift certificate purchase

The provision of the requested data is necessary to purchase the gift certificate or a voucher spendable at the facility. The legal basis for the processing is indicated by Article 6 paragraph 1 letter b) of the GDPR, and is 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. The data processed and related to your request will be kept by us for the time required by civil, accounting and tax regulations and therefore for 10 years

Processing methods, automated decision-making processes, and data retention times

The processing of your data takes place electronically, although potential paper-based processing is not excluded. No automated decision-making processes are used to process your personal data.

Data collected through cookies will be kept for the period of time established by the individual cookie. Additionally, if profiling cookies are used by the site their function must be described, as required by the specific section.

Data communication (Recipients)

To guarantee the functioning of our website and the use of its content, we may rely on use third-party suppliers such as IT service providers, hosting companies, and communication companies and software vendors to send newsletters or other promotional and/or organizational communications. In addition, to guarantee the requested service, for example in the case of the purchase of products and the likes, we may also use additional third-party suppliers (postal couriers, etc.). The legal basis of the communication is the fulfilment of contractual and regulatory obligations, as well as the execution of pre-contractual measures adopted at your request. It is understood that we will only communicate to the Addressees the data necessary to be able to perform the service, preferring, where possible, the anonymization of the data. The information you provide will not be disclosed without your specific prior consent.

As for the use of third-party cookies, please refer to the specific section at the end of this document.

Transfer of data to third countries or international organizations

Some cookie providers or tools used by our website may transfer personal data to the United States. Since the transfer cannot be made by virtue of other means under the GDPR, the consent of the data subject is required.

For credit card payments, Midenza uses a provider that may process data in the United States, a company that presents guarantees that the data subject's rights are respected. If the user does not agree to the transfer, it is recommended to use alternative means of payment.

Please note that the United States does not guarantee adequate data privacy protection measures for European citizens at this time, and local authorities may request access to information without special guarantee mechanisms. The user is advised to carefully consider whether he or she intends to consent to this processing.

The cookies and providers that may transfer data to the United States are:

- Google
- Facebook (Meta)
- Stripe

The hosting of the site is within the European Union.

The provider of the management software used by Midenza is a San Marino company, which, formally, is a non-EU state. For the purpose of the transfer, standard contractual clauses have been signed according to the model approved by the European Commission.

Rights of the interested party and complaints to the Privacy Guarantor

You have the right to request access to your data at any time, its modification, integration, or deletion, limitation or opposition to its processing, where legitimate reasons exist, as well as the portability of the aforementioned data to another Data controller. We will reply in writing to any requests within 30 days. You can revoke, at any time, consent given to this site, by contacting one of the addresses listed in this Privacy Policy. You may also lodge a complaint with the National Control Authority, if you believe that your data has been illegitimately processed.

COOKIES ON OUR SITE

Navigation data

This website implicitly acquires, using Internet communications protocols, for and in the course of its normal operations, some personal data on the users who access the site, like IP address, domain names of the computers used for access, MAC addresses assigned by network and wireless card manufacturers, etc.

This information is not collected for the purpose of identifying users, but this could be done by associations and processing, including cross-referencing with third-party data; statistical information is obtained from this data on site usage and operations and further information in cases of establishing responsibility related to computer crimes.

What are cookies?

Cookies are small text strings that the websites visited by a user install on the user's terminal; these strings are then re-transmitted to the site that installed them upon further visits by the user. When the user also receives cookies sent by other sites or web servers during site navigation, those cookies are called third-party cookies.

Cookies are installed for various purposes, possibly including the performance of computer authentications, navigation session monitoring, and language choice.

First-party cookies and third-party cookies

The cookies that are installed directly by Midenza are called 'First-party cookies', and the cookies that are installed and acquired by a site other than the one the user is navigating are called 'Third-party cookies'.

Third-party cookies may include social media buttons (or social media plug-ins), which allow the site to interact with the most popular social media sites, such as Facebook, Instagram, LinkedIn, Twitter, etc., or Google Analytics cookies, which are necessary to implement YouTube iframes, etc. As regards third-party cookies, it is the responsibility of the third parties installing those cookies to provide statements and information on the handling of the data collected.

Types of cookies

Technical cookies

These are normally installed directly by the site administrators and are cookies that allow communications between the site and the user. They can also be called "navigation cookies", "session cookies", "essential cookies" or "necessary cookies" and are designed to ensure normal navigation and use of the site and usually last as long as the site is being navigated.

As these cookies are necessary for the functioning of the site, it is not necessary to obtain prior consent for their installation on the user's terminal.

Functionality Cookies

These cookies provide the user with advanced functionalities and customizations, and they also remember the preferences indicated by the user during previous visits, or the user modifications performed during previous visits in order to customize the site. The cookies that fall under this category, for example, allow the user to choose a language or save the selected products in the cart.

Performance Cookies

These “performance cookies” are also known as “analytical cookies”, and they provide an analysis of how the user uses the site in order to improve the navigation experience and resolve issues related to navigation.

These cookies, for example, allow counting visits and tracking traffic sources or the most viewed pages.

Profiling cookies

They can also be called “advertising cookies” and are used to track a user’s preference and offer him/her advertising messages based on those preferences.

First access banner

In the event cookies other than technical cookies are used, the Act of 8 May 2014 by the Garante Privacy and the Guidelines of the Garante Privacy of 26 November 2020 require the site to provide a banner when a user first accesses the site (called a short notice) that summarises information on the processing methods the site uses for cookies. The banner must refer to the privacy policy in full and must provide a request for consent to the installation of the cookies, even by way of granular selection.

Midenza has provided this banner. It has also provided a specific cookie that records the user’s choice regarding cookie installation for 180 days; this means that the user (once given the consent) will see the cookie only one time, and if he/she should later wish to change the choice made, he/she can do this from the link for the cookies management.

Facebook permissions requested by the site and use of Facebook Pixel.

Our site may require you to log in with your Facebook account to perform certain actions and collect information directly from Facebook.

For more information on how this feature works, see <https://developers.facebook.com/docs/facebook-login/permissions> and <https://www.facebook.com/about/privacy/>