

## PRIVACY POLICY OF BLOG.TRAVELEMILIAROMAGNA.COM

Privacy Policy - Art. 13 Regulation (EU) 2016/679 (GDPR)

### INTRODUCTION

**What is this document?** This is the Privacy and Data Protection Policy for this website.

**Who should read this document?** This Privacy Policy applies to all website users and operators.

**Why is this document necessary?** According to Art. 13 of the GDPR (Regulation EU 2016/679), you as the Data Subject must be provided with information as to the personal data undergoing processing and the identity of the controller, thus ensuring fair and transparent processing. Therefore, this document will contain the following information:

- who will be processing your data (Data Controller and Data Processors)
- which personal data are processed
- the purposes for which personal data are processed
- how long personal data will be retained for
- your data protection rights

**What is the applicable law?** This Policy was drafted in compliance with:

- the GDPR (Regulation (EU) 2016/679)
- Legislative Decree 196/2003 (Italian Privacy Code), as updated by Legislative Decree 101/2018

This Privacy Policy does not cover hyperlinks that may exist within this website to other websites, web pages or online services (e.g. external sources).

### PRIVACY POLICY

#### THE DATA CONTROLLER

The Data Controller is APT Servizi s.r.l. based in Bologna (Italy), Viale Aldo Moro, no. 62 - CAP 40127, e-mail [privacy@aptservizi.com](mailto:privacy@aptservizi.com)

#### THE DATA PROTECTION OFFICER

The Data Protection Office (DPO) may be contacted at: APT Servizi - Responsabile della Protezione dei Dati personali, Piazzale Fellini 3, IT-47921 - Rimini (Italy), e-mail: [dpo@aptservizi.com](mailto:dpo@aptservizi.com), PEC: [dpo@pec.aptservizi.com](mailto:dpo@pec.aptservizi.com)

#### PURPOSES, LEGAL BASIS, NATURE OF THE PROCESSING AND DURATION OF DATA RETENTION

We collect your personal data for the following purposes:

- a. Complying with regional policies on tourism:
  - The legal basis for this processing is the duty for the Data Controller to fulfil a legal obligation on behalf of the Emilia-Romagna region pursuant to [Regional Law No. 4 of 25 March 2016](#);
  - The data processed for this purpose will be retained for the duration of the contract and, in the event of litigation, for the duration of the litigation and until the judgment becomes final;
  - The provision of personal data is mandatory and required by contract; any refusal to provide such data will prevent us from performing our contractual obligations.
- b. Complying with laws, regulations, and secondary legislation:
  - The legal basis for this processing is the duty for the Data Controller to fulfil a legal obligation;
  - The data processed for this purpose will be retained for the duration of the contract and for 10 years after the termination of the contractual relationship. In the event of litigation, the data will be retained for the duration of the litigation and until the judgment becomes final;
  - The provision of personal data is mandatory and required by law; any refusal to provide such data will prevent us from performing our contractual obligations.
- c. Responding to contact requests:
  - The legal basis for this processing is the right of the Data Controller to pursue its legitimate interest in responding to requests by Data Subjects;
  - The data processed for these purposes will be retained for the period necessary to respond to such requests;
  - The provision of the personal data marked with an asterisk in the contact form is mandatory; any failure to provide such information will prevent the Controller from responding to your request. On the other hand, where any information is not marked with an asterisk then such information is optional, although we may use it to facilitate the relationship that we have with you, the Data Subject. Any failure to provide such information will not prevent us from managing and responding to your request.
- d. Sending marketing and promotional material (newsletters, offers, etc...) about products and services that may interest you based on previous purchases, and anonymous market research surveys (e.g. anonymous surveys and customer satisfaction surveys, etc...):
  - The legal basis for this processing is the right of the Data Controller to pursue its legitimate interest;
  - The data processed for these purposes will be retained until the Data Subject decides to unsubscribe from receiving such promotional communications/newsletters.
- e. Sending information and promotional material (newsletters, offers,...) and market research surveys (e.g. customer satisfaction surveys...):
  - The legal basis for this processing is the Data subject's explicit consent;
  - The data processed for these purposes will be retained until the Data Subject decides to unsubscribe from receiving such promotional communications/newsletters.
- f. Detecting or preventing unlawful activities or protecting and enforcing legal rights.
  - The legal basis for this processing is the right of the Data Controller to pursue its legitimate interest in preventing or prosecuting offences or violations of intellectual/industrial property rights (including third parties' rights) or computer-related crimes or crimes committed using telecommunication networks.
  - The data processed for this purpose will be retained for the time reasonably necessary to protect and enforce the Controller's rights once a suspected offence is reported.

#### PERSONAL DATA PROCESSED

By 'processing' we mean any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

We may also collect “special categories of data”, as set forth in article 9 GDPR. These special categories include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as data concerning health or data concerning a natural person’s sex life or sexual orientation. The Data Controller shall process such data only if explicit consent was given by the Data Subject.

We will be processing the following personal data:

- Data to subscribe to our newsletter  
The personal data processed to receive the newsletter are: Name, Surname, Email address.
- Browsing data  
The IT systems and software procedures used to run this website automatically collect personal data whose transfer is implied in the Internet communication protocols.  
Such data include IP addresses, the name of the computer or the domain names of the computers and terminal equipment used by any user, URI/URL (Uniform Resource Identifier/Locator) addresses of the requested resources, the time of such request, the method used for submitting a given request to the server, the returned file size, a numerical code indicating the server response status (successfully completed, error, etc.), and other parameters related to the user’s operating system and IT environment.  
We also process browsing data, which are necessary to use the services we offer, to:
  - obtain statistics (most visited pages, number of visitors at any one time or daily, geographical area, etc.);
  - check the correct functioning of the offered services.
 Browsing data will be retained for no more than 365 days and are immediately deleted after being aggregated (unless they are requested by the competent authorities for the purposes of the investigation of criminal offences).
- Data provided by the user  
Whenever a user voluntarily and explicitly sends us a message or contacts us, any data that is provided through the contact form will be stored for the time necessary to respond to the user’s enquiry.  
The user may register to the website to access the secure area and use the services offered by the Data Controller.
- Cookies and other tracing systems  
Please refer to the detailed information available at the following link: <http://blog.travelemiliaromagna.com/cookie>

#### **DATA RELATING TO PERSONS UNDER 18 YEARS OF AGE**

Users under 18 years of age cannot provide personal data. The Data Controller shall not in any way be held responsible for any collection of personal data or false statements provided by individuals aged under 18 and, should their data have been processed, the Data Controller shall grant the right of access to and erasure of the same to the legal guardian or to the person who has parental authority.

#### **PERSONAL DATA RECIPIENTS**

In order to fulfil the abovementioned purposes, we may share your personal data with:

- Any data processors such as companies, individuals or professionals that provide the Data Controller with accounting, administrative, legal, tax and debt collection services;
- Any party involved in the provision of our services;
- Any individuals, entities or authorities with whom it may be mandatory to share your personal data, in compliance with applicable laws or orders;
- Employees expressly authorised by the Data Controller; such employees are subject to confidentiality agreements or have received specific instructions and are involved in the provision of the services;

You may receive a list of all data processors by sending a written request to the Data Controller.

#### **TRANSFER OF PERSONAL DATA**

Some of your personal data are shared with recipients that may be located outside the European Union. The Data Controller shall ensure that the personal data are processed by such recipients in compliance with the GDPR. The transfers may be based on an “adequacy decision” or on the Standard Contractual Clauses approved by the European Commission. For more information, please contact the Data Controller.

#### **AUTOMATED DECISION-MAKING AND PROFILING**

The Data Controller shall not use your data for profiling or any automated decision making processes, as set forth by art 22 of the GDPR.

#### **DATA SUBJECTS’ RIGHTS**

The Data Subjects shall have the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the Data Subject or to object to processing (article 15 and following articles of the GDPR). Such request shall be submitted to the Data Controller via email.

#### **RIGHT TO FILE A CLAIM**

Should the Data Subjects believe that the processing of their personal data has breached the provisions of the GDPR, they shall have the right to file a claim with the Data Protection Authority ([www.gdpd.it](http://www.gdpd.it)), as set forth by art. 77 of the GDPR, or with the relevant judicial authorities (art. 79 of the GDPR).

#### **AMENDMENTS**

The Data Controller shall have the right to amend this privacy policy at any time. The current version is available on:

[https://www.aptservizi.com/azienda/privacy/informativa\\_sitiweb/](https://www.aptservizi.com/azienda/privacy/informativa_sitiweb/)