GDPR PRIVACY POLICY

Information provided pursuant to Art.13 of Reg. EU 2016/679 (hereinafter GDPR)

General information

Users (data subjects, as GDPR, Art.4, c1) are informed of the following general profiles, valid for all areas of processing:

- all personal data are processed in compliance with the applicable privacy regulations in force (EU Reg. 2016/679 and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018);
- all User data are processed in a lawful, correct and transparent manner, in compliance with the general principles set out in Article 5 of the GDPR;
- specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access, pursuant to Article 32 of the GDPR.

Data Controller

The Data Controller is the undersigned Company (in the person of its pro-tempore legal representative) who can be contacted for any request regarding privacy or to exercise the rights listed below, at the following addresses:

DATA CONTROLLER:
Name: Magia Srl
Email: info.piacenzafiera@magiahotels.it

Data subject's rights

- right to request the presence and access to personal data concerning him (Article 15 "Right of access");
- right to obtain the rectification / integration of inaccurate or incomplete data (Article 16 "Right to rectification");
- the right to obtain, if there are justified reasons, the cancellation of data (Article 17 "Right to erasure");
- right to obtain the limitation of processing (Article 18 "Right to restriction");
- right to receive the data concerning him in a structured format (Article 20 "Right to portability");
- right to object to the processing and to automated decision-making processes, including profiling (Articles 21, 22 "Right to object");
- right to revoke a previously given consent;
- the right to submit, in the event of non-response, a complaint to the Data Protection Authority.

The following specific information is provided below, referring to:
1) data processing connected to the functioning of this website
2) data processing of customers / suppliers

1) DATA PROCESSING CONNECTED TO THE FUNCTIONING OF THIS WEBSITE

1.1 Navigation data

The IT systems and the software procedures used in the operation of this web site acquire, in the course of their normal processing, some personal data, the transmission of which is necessary in the use of the Internet communication protocols. These deal with information that is not gathered to be associated to identified parties, but which by their nature could, through processing and associations with data held by third parties, allow the identification of the users. Under this category of data we find the IP addresses or the computer domain names used by the users that connect to the site, the addresses in URI (Uniform Resource Identifier), notation of the resources requested,the time of the request, the method used in submitting the server request, the dimension of the file received, the numeric code indicating the status of the answer given by the server (successful, error, etc.) and other parameters related to the operating system and the user's IT environment.

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	This data is used only for the purpose of receiving anonymous statistical information on the use of the site and to control its correct functioning. The data could moreover be used to ascertain the responsibility in case of presumed IT crimes to the damage of the site (legitimate interests of the owner).
Scope of knowledge (GDPR-Art.13, paragraph 1, letter e,f)	The data is processed exclusively by in-house staff, duly authorised and trained in data processing (GDPR-Art.29) and shall not be disclosed to external parties, diffused, or transferred to countries outside the EU. Only in cases of investigation, this data may be placed at the disposal of the competent authorities.
Data retention (GDPR-Art.13, paragraph 2, letter a)	This data is usually kept for brief periods, with the exception of possible prolonged connections related to investigation activities.
Data provision (GDPR-Art.13, paragraph 2, letter f)	The data is not submitted by the party involved but acquired automatically by the site's technological systems.

1.2 Cookies
The management of cookies is aligned with the relevant regulatory requirements:

- "Guidelines for cookies and other tracking tools" of 10 June 2021 (Published in the Official Gazette no. 163 of 9 July 2021);
- Guidelines 5/2020 on consent pursuant to regulation (EU) 2016/679, adopted by the European Data Protection Board.
- Transnational agreements on extra-EU data flows, stipulated pursuant to Title V of the GDPR.

Users can analytically verify the types of cookies and set their preferences via the appropriate banner (if provided; if not provided, this means the site uses exclusively technical cookies). Below is some general information regarding cookies and similar technologies.

What are cookies
Cookies are short fragments of text (letters and / or numbers) that allow the web server to store information on the client (the browser) to be reused during the same visit to the site (session cookies) or later, even after some days (persistent cookies). Cookies are stored, according to user preferences, by the single browser on the specific device used (computer, tablet, smartphone). Similar technologies, such as, for example, web beacons, transparent GIFs and all forms of local storage introduced with HTML5, can be used to collect information on user behavior and on the use of services. In the remainder of this information we will refer to cookies and all similar technologies by simply using the term "cookie".

Possible types of first-party cookies and methods of managing preferences

CATEGORIES	PURPOSE	CODING CRITERIA
Navigation technical, of session, of functionality	Guarantee the normal navigation and use of the site	Using major browsers, you can: • Block all (or some) types of cookies by default • View the detailed list of cookies used • Remove all or some installed cookies For information on individual browser settings, see the specific section. Please note that blocking or deleting cookies may affect the site's navigation
Technical analytical	Collect information on the number of visitors and pages viewed	
Functional technicians	Allow navigation based on a series of selected criteria	
Profiling	Create user profiles in order to send advertising messages in line with preferences	

Managing preferences through the main navigation browsers
Users can decide whether or not to accept cookies using their browser settings (please note that, by default, almost all web browsers are set to automatically accept cookies). This setting can be changed and customized for different websites and web applications. Furthermore, the best browsers allow you to define different settings for first-party and third-party cookies. Cookies are typically configured from the "Preferences," "Tools," or "Options" menus. Below are links to the cookie management guides for the main browsers:

Microsoft Edge
https://support.microsoft.com/it-it/microsoft-edge/eliminare-i-cookie-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09

Internet Explorer
http://support.microsoft.com/kb/278835

Chrome:
http://support.google.com/chrome/bin/answer.py?hl=en-GB&answer=95647

Safari:
https://www.apple.com/legal/privacy/it/cookies/#:~:text=Se%20vuoi%20disabilitare%20i%20cookie,produttore%20come%20disabilitare%20i%20cookie.

Firefox:
http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies

Opera:
https://help.opera.com/en/latest/web-preferences/

More information

- www.garanteprivacy.it/cookie (collection of the main regulatory interventions on the matter by the Italian Guarantor Authority)
- www.allaboutcookies.org (for more information on cookie technologies and how they work)
- www.youronlinechoices.com/it/a-proposito (allows users to oppose the installation of the main profiling cookies)

1.3 Connections with portals and social media
The website may contain buttons, widgets, plug-ins, links, or cookies from social networks to facilitate interaction with social media platforms and the sharing of content. Examples include, but are not limited to: Facebook Pixel, Facebook remarketing, Facebook segmentation, etc. (which, in any case, employ technologies and tools—such as anonymization or hashing/encryption systems—that reduce the ability of cookies to identify individuals). Please note that the processing of data entered by the user on various social media channels is governed by the privacy policies and settings of the respective social network, which the user agreed to upon registration. For your information, provided below are links to the main social media platforms, where you can manage your privacy settings and cookie preferences:
– Facebook (policy): https://www.facebook.com/help/cookies/
– Facebook (settings): via your account – privacy section
– Instagram (policy): https://www.instagram.com/legal/privacy
– LinkedIn (policy): https://www.linkedin.com/legal/cookie-policy
– LinkedIn (settings): https://www.linkedin.com/settings
– Google+ (policy): http://www.google.it/intl/it/policies/technologies/cookies/
– Google+ (settings): http://www.google.it/intl/it/policies/technologies/managing/
– X (policy): https://support.twitter.com/articles/20170514
– X (settings): https://twitter.com/settings/security
– Google remarketing (policy): http://www.google.com/intl/it_it/policies/technologies/ads/
– Google remarketing (disabling): https://www.google.it/ads/preferences

1.4 Booking Management
Making a booking does not require the creation of a user profile; the data collected is processed exclusively for the purpose of finalizing the transaction and confirming the stay/service.

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	Data necessary for the administrative/operational management of bookings (e.g., payment details, delivery information, etc.) and related services is requested. Processing is carried out to fulfill contractual and pre-contractual obligations (booking a stay) as well as relevant legal obligations (GDPR, Article 6, paragraph 1, letters b and c). The completion of optional fields is intended to provide information and services that are better aligned with the user's profile.
Scope of knowledge (GDPR-Art.13, paragraph 1, letter e,f)	Data is processed by internal personnel who are duly authorized and trained in data processing (GDPR, Art. 29), by external parties that manage the platform, or by entities involved in the provision of purchasing/delivery services. Data will not be disseminated or transferred to countries outside the EU.
Data retention (GDPR-Art.13, paragraph 2, letter a)	Data is retained for periods consistent with the purpose of its collection and related legal obligations (such as the retention of administrative documentation), and in any case until such time as the user may request its deletion.
Data provision (GDPR-Art.13, paragraph 2, letter f)	Failure to provide the data makes it impossible to complete the booking.

1.5 Newsletter subscription
The newsletter allows for constant and extensive in-depth analysis of useful information in the reference sector, events and initiatives, the products/services offered, as well as any promotional offers.

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	Should the User/Customer wish to receive promotional information, tailored offers, and newsletters regarding the establishment's services, they are asked to provide their email address (along with any other contact details they may choose to share). Processing for this purpose is based exclusively on the data subject's free, specific, and informed consent (GDPR Art. 6, paragraph 1, letter a), indicated by selecting a dedicated checkbox online or by signing a specific form at the establishment (GDPR Art. 7). Providing consent is entirely optional and may be withdrawn at any time.
Scope of knowledge (GDPR-Art.13, paragraph 1, letter e,f)	Data is processed exclusively by personnel who are duly authorized and trained in data processing (GDPR, Art. 29). Access to the data—solely for the purpose of site maintenance—may be granted to the company that provides the technological platform, as well as to any providers of specific technologies related to newsletter services. Data will not be disseminated or transferred to countries outside the EU.
Data retention (GDPR-Art.13, paragraph 2, letter a)	The data is retained until such time as you may choose to "unsubscribe"—an action you can freely take at any moment via the link provided at the bottom of every message sent.
Data provision (GDPR-Art.13, paragraph 2, letter f)	Failure to provide your email address and consent means that it will not be possible to receive the newsletter service.

1.6 Contact and information requests
The page allows the individual concerned to request information. Identifying and contact details are requested.

Purpose and legal basis of the processing (GDPR-Art.13, paragraph 1, letter c)	The identification and contact data necessary to be able to respond to contact requests from interested parties are requested. The sending of the request is subject to specific, free and informed consent (GDPR-Art.6, paragraph 1, letter a), documented via a specific check-box (GDPR-Art.7, paragraph 1)

Communication scope (GDPR-Art.13, paragraph 1, letter e,f)	The data are processed exclusively by personnel regularly authorized and trained in processing (GDPR-Art.29). The data may be accessed only for site maintenance purposes by the company that provides the technological platform and its representatives. The data will not be disclosed or transferred to non-EU countries..
Data retention period (GDPR-Art.13, paragraph 2, letter a)	The data is stored for times compatible with the purpose of the collection
Contribution (GDPR-Art.13, paragraph 2, letter f)	The provision of data relating to the mandatory fields is necessary in order to obtain a response, while the optional fields are aimed at providing the staff with further useful elements to facilitate contact.

1.7 Data provided voluntarily by Users
The optional, explicit and voluntary sending of messages to contact addresses, private messages sent by users to institutional profiles/pages on social media (where this possibility is provided), as well as the compilation and forwarding of any forms/modules present , involve the acquisition of the sender's contact details, necessary to reply, as well as all personal data included in the communications. The sender therefore remains personally responsible for the accuracy of the data provided, as well as their pertinence and non-excess with respect to the requests in question.

2) DATA PROCESSING OF CUSTOMERS / SUPPLIERS

2.1 Object of the processing
The company processes personal identification data of customers/suppliers (for example, name, surname, company name, personal/fiscal data, address, telephone, e-mail, bank and payment references) and their operational contacts (name, surname and data contact details) acquired and used in the context of the provision of the products/services supplied.

2.2 Purpose and legal basis of the processing
The data is processed for:

- conclude contractual/professional relationships and provide related services;
- fulfill the pre-contractual, contractual and tax obligations deriving from existing relationships, as well as manage the necessary communications connected to them;
- fulfill the obligations established by law, by a regulation, by community legislation or by an order from the Authority;
- exercise a legitimate interest as well as a right of the Data Controller (for example: the right of defense in court, the protection of credit positions; ordinary internal operational, managerial and accounting needs).

Failure to provide the aforementioned data will make it impossible to establish the relationship with the Data Controller. The aforementioned purposes represent, pursuant to Article 6, paragraphs b, c, f, suitable legal bases for the lawfulness of the processing. If you intend to carry out treatments for different purposes (eg: marketing communications, production of photo/video content, etc.) a specific consent will be requested from the interested parties.

2.3 Processing methods and storage time
The processing of personal data is carried out by means of the operations indicated in the Art. 4 no. 2) GDPR and precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data. Personal data is subjected to both paper and electronic processing. The Data Controller will process the personal data for the time necessary to fulfill the purposes for which they were collected and related legal obligations (usually coinciding with the relationship with the interested party, without prejudice to the extension with reference to the obligations to keep administrative documentation and of business correspondence).

2.4 Scope of processing
The data is processed by duly authorized and trained internal subjects pursuant to Article 29 of the GDPR. It is also possible to request the scope of communication of personal data, obtaining precise indications on any external subjects who operate as independent data processors or data controllers (eg: consultants, technicians, banks, carriers, etc.). The data may be communicated to any subsidiary/associated company for various reasons. The data are not subject to dissemination or transfer outside the EU (they may be transferred outside the EU only in compliance with the conditions set out in Chapter V of the GDPR, aimed at ensuring that the level of protection of the data subjects is not compromised "Art.45 Transfer on the basis of an adequacy decision, Art.46 Transfer subject to adequate guarantees, Art.47 Binding corporate rules, Art.49 Specific exceptions"). The data are not subject to automated processes that produce significant consequences for the data subject.

3) PROCESSING CONNECTED TO ELECTRONIC MAIL COMMUNICATIONS
All email communications sent to @magiahotels.it domain addresses are of a strictly business nature and purpose and may therefore be disclosed within the organization. All text and attachments to emails sent by this company are intended to be confidential to the recipients and to be used for purposes strictly related to the existing relationship. If emails are sent/received in error, they must not be disclosed, copied, or distributed for any reason. All personal data will be processed in accordance with applicable privacy regulations and the general principles outlined in this policy.

4) POLICY UPDATE

Please note that this policy may be subject to periodic revision, including in light of applicable legislation and case law. In the event of significant changes, appropriate notice will be provided on the website's homepage for an appropriate period of time. However, we encourage you to periodically review this policy.