PRIVACY POLICY

Pursuant to Articles 12 et seq. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, 'Regulation' or 'GDPR'), and in compliance with the principle of transparency, we provide the following information on the processing of personal data (i.e. any information relating to an identified or identifiable natural person: 'Data Subject') in connection with the use of the website www.ilgabbianocampingvillage.com ('Website').

This privacy policy applies to the processing of personal data both during browsing and any interaction between the user and Paradiso srl, including communications or the use of services via the reserved area.

If the User uses links on the Site to interact with entities third parties (e.g., social media) the latter will act as the Holders of the processing of the User's data processed by them at that point, and the User is therefore invited to read the relative privacy policies on the processing of personal data that the same are required to provide.

For data processed in the **'Careers'** section, please refer to the specific privacy notice.

During the availability check and booking process, request data will be shared with the company to which the User's inquiry relates.

SUMMARY TABLE OF KEY INFORMATION

Purpose (point 2)	**Categories of data (point 3)**	**Legal Basis (point 4)**	**Duration (point 5)**	**Disclosures to parties other than employees or Data Processors (section 6)**
Functioning and security of the site For other purposes related to	Data of navigation	Legitimate interest of the Holder to the activity of enterprise and security	No later than 24 hours	No

cookies, please refer to the Cookie Policy.				
Contractual (offers and sales; customer support)	Common data such as personal details, contact information, affiliated company, access credentials, etc.	Necessity to take pre-contractual measures at the request of the Data Subject or to perform a contract to which the Data Subject is a party. Legitimate interest in legal protection.	Statute of limitations for rights; If the request does not result in the conclusion of a contract, or if the information is not contractually relevant, the personal data will not be deleted before the end of the tourist season;	Facilities to which the availability request or purchase refers
Direct marketing	Common data such as name, phone number, and email address	Consent	No later than 48 months after consent or its renewal	No

For all personal data processing carried out through cookies, please refer to the specific policy.

1. DATA CONTROLLER AND CONTACT DETAILS OF THE DATA PROTECTION OFFICER (DPO)

The Data Controller (i.e., the entity that determines the purposes and means of the processing of personal data) is Paradiso srl (hereinafter also referred to as the "Controller"), with registered office at Via Aquileia 47 - 58100 Grosseto (GR), Tax Code and VAT No. 00608810537, certified email (PEC): paradisosrlgr@pec.it.
For matters specifically concerning the protection of personal data, including the exercise of the rights set out in section 8 below, please contact the following email address: info@ilgabbianocampingvillage.com.

The Controller has appointed a Data Protection Officer (DPO), who can be contacted at: info@ilgabbianocampingvillage.com.

2. PURPOSE OF PROCESSING

Personal data may be processed for the following purposes:

- the proper functioning and security of the Website (***Website functionality purpose***); other types of cookies (particularly analytical ones), which are not strictly necessary, are also used—please refer to the specific cookie policy.
- management of sales services, including the preparation of offers and customer support (**contractual purpose**);
- promotion and sale of products through letters, telephone calls, automated communication systems, email, etc., as well as market and customer satisfaction surveys (**direct marketing purpose**).

3. TYPES OF DATA PROCESSED AND COLLECTION METHODS

The data processed fall into the category of common data, such as those listed below.

For contractual purposes, we specifically process personal identification data, purchase and payment-related information, including payment instruments.

The systems and programs used for the operation of the Website collect certain personal data whose transmission is implicit in the use of Internet communication protocols ("***Browsing Data***"), e.g., IP addresses or domain names of the computers used by users connecting to the Website, URI (Uniform Resource Identifier) addresses of the requested resources, time of request, method used to submit the request to the server, size of the response file, numerical code indicating the server response status (success, error, etc.), and other parameters related to the user's operating system and IT environment.

Although such information is not collected to be associated with identified users, by its nature it could, through processing and association with data held by third parties, allow users to be identified and is therefore considered personal data. In connection with the browsing data collected, we also invite you to review our Cookie Policy.

We also process data provided by the User or otherwise resulting from their interaction with the Website, including through chat, the contact

section, or by sending messages. These may include:
– first name, last name, contact details, number and age of family members or other travelers, and areas of interest.

4. MANDATORY OR OPTIONAL NATURE OF DATA PROVISION AND LEGAL BASIS FOR PROCESSING

As mentioned, the transmission of Browsing Data is inherent in the use of the Website, and the legal basis for the processing of personal data for the **purpose of ensuring the Website's functionality** is the Controller's legitimate interest in conducting business, including ensuring security and protection from abuse.

Providing the requested data related to **Website services**, including sales, and the **information given in User communications** is optional. The only consequence of not providing such data may be that the User is unable to access certain services or that the Controller cannot provide the requested information. The legal basis for this processing, according to Article 6(b) of the GDPR, is the necessity of taking steps at the request of the data subject prior to entering into a contract or the performance of a contract (e.g., product inquiries, quotations, or configuration of purchased products).

Regarding **direct marketing purposes**, providing personal data is optional and not providing it will not affect the contractual relationship or the use of the Website services. This type of processing is carried out only with the consent of the recipient (consent is also required for legal entities in this context), which may be withdrawn at any time (see section 8 "Data Subject Rights"), and which constitutes the legal basis. It should be noted that the withdrawal of consent or objection to processing carried out through automated means (e.g., automated calling systems, e-mail, messaging) also extends to traditional methods (e.g., paper mail, operator-assisted calls), unless the User exercises the right only in part—for example, by objecting only to communications sent via automated systems.

5. DATA PROCESSING METHODS AND RETENTION PERIODS

Data processing will be carried out:

- using both manual and automated systems;
- by personnel specifically authorized and trained for their respective tasks;
- with appropriate measures to ensure data confidentiality and prevent access by unauthorized third parties.

Specifically for marketing purposes, personal data will also be processed using:

- automated calling or communication systems;
- electronic communications such as e-mail and messaging;
- telephone calls with an operator and postal mail.

Browsing data will be deleted—unless unlawful activity is detected—no later than 24 hours after collection.

For marketing purposes, data will be processed for no longer than 48 months from the time of consent or its renewal.

Data related to Website services will be retained for the time necessary to provide the service and verify its execution; ordinarily, they will not be kept beyond 6 months after the service has been used.

Data related to a contractual relationship will be retained for the entire duration of that relationship and, afterward—limited to the data necessary—for the fulfillment of any legal obligations and for purposes of legal protection connected to or arising from it; ordinarily, such data will not be kept beyond 10 years from the end of the contractual relationship.

6. DATA DISCLOSURE

During the availability check procedure, the request data will be forwarded to the company to which the User's inquiry refers.

Collected data may also be disclosed, solely for the purposes stated above, to:

- all entities legally entitled to access such data;
- collaborators and suppliers of the Controller, within the scope of their roles and/or contractual obligations related to the execution

of the relationship with the data subject. Such suppliers may include, for example, banks and credit institutions, insurance companies, legal consultants, shipping providers, and software providers with related support services; specifically, the software infrastructure for Website operations and customer relations is also managed through Cookiebot™ (cookies), We4guest – AMG s.r.l. (newsletter service), and Zucchetti Group (booking via simplebooking.it), who act as Data Processors on our behalf. A complete and updated list of Data Processors can be requested by contacting the Controller through the contact details provided in this policy.

Data will not be publicly disclosed.

7. DATA PROCESSING LOCATION

Personal data will be processed within the European Union, and there is no intention to transfer such data outside this area.

8. DATA SUBJECTS RIGHTS

Under the GDPR, the data subject has the following rights regarding their personal data (this is a summary; please refer to Articles 15–22 of the Regulation for a complete list and applicable limitations):

- **Right of access** – to obtain free information about personal data held by the Controller and its processing, and to receive a copy in an accessible format;
- **Right to rectification** – to request the correction or integration of inaccurate or incomplete personal data (not including evaluative elements);
- **Right to erasure ("right to be forgotten")** – for example, when the data are no longer necessary for the purposes for which they were collected or processed; have been unlawfully processed; must be deleted to comply with a legal obligation; or when the data subject withdraws consent and no other legal basis exists;
- **Right to restriction of processing** – in certain cases, such as contesting data accuracy, unlawful processing with opposition to

deletion, or the need for data in legal defense even if they are no longer necessary for processing. During such restrictions, data will be stored in a way that ensures they are not processed except with the data subject's consent or for legal purposes;

- **Right to object** – in whole or in part, to processing based on legitimate interest, for reasons related to the data subject's specific situation. No justification is needed to object to processing for marketing or profiling purposes;
- **Right to data portability** – where the processing is based on consent or a contract and is carried out by automated means, the data subject has the right to receive their personal data in a structured, commonly used, and machine-readable format and transmit it to another controller. Where technically feasible, this transfer may occur directly between controllers.

If processing is based on consent (see section 4), **consent may be withdrawn** at any time without affecting the lawfulness of processing carried out prior to the withdrawal. The easiest way to withdraw consent is via the link at the bottom of our communications or through the personal dashboard in the Website's reserved area.

The data subject also has the right **to lodge a complaint with the Italian Data Protection Authority** if they believe their rights have been violated (www.garanteprivacy.it). Nevertheless, we would appreciate the opportunity to address any concerns directly. Please contact us at info@ilgabbianocampingvillage.com or the DPO using the contact details provided above for any clarification or to exercise your rights, including withdrawal of consent.