

## **Customer Policy on the use of their Personal Data and on their Rights** *Article 13 of EU Regulation No 679/2016 - European Data Protection Regulation*

Dear Customer,

In order to provide you with the required products and/or services, we need to collect and use certain data concerning you.

### **WHAT DATA DO WE COLLECT?**

The data that we collect is the data that you provide us with (such as your name, surname, place of residence, telephone numbers and email addresses, date and place of birth, nationality); the provision of this data is necessary in order to be able to host you as a customer at our agritourism facilities, namely "*Villa Grazianella, La Poderina, Tenuta di Monterufoli, Tenuta di Montecorona*".

### **WHY WE ASK FOR YOUR DATA**

Your data will be processed by our Company:

- A. in order to be able to host you as a customer at our facilities and provide you with the related services. Broadly speaking, the provision of this data is necessary for the provision of the service and for its management and implementation; in some cases, law, regulations and EU legislation render it mandatory. In the absence of such data, we cannot allow you to stay at the afore-mentioned facilities.
- B. Provided that you give your consent, some of your data (such as your name, surname, place of residence, telephone numbers and email addresses), with the exclusion of any data belonging to the special categories of personal data<sup>1</sup>, may be used for purposes of information and commercial promotion or remote marketing, either by UNIPOL<sup>2</sup> Group companies and/or third-party companies; specifically, this may involve the sending of newsletters and advertising material, direct sales, the performance of market research and/or surveys on the quality of products already purchased by you, or commercial communications through the use of remote communication techniques, including automated contact methods (such as SMS, MMS, fax, automated telephone calls, emails, messages on web applications) and traditional communication techniques (such as paper mail and telephone calls with an operator service). For the purposes specified in this point B, the provision of your personal data will be optional and if you do not wish to provide your personal data, this will have no consequences in relation to what is stated in point A above, but shall only preclude the fulfilment of the activities mentioned in this point B.

### **HOW WE PROCESS YOUR DATA**

In order to pursue the aforementioned purposes, your data will not be disseminated and will be processed using appropriate methods and procedures, including IT and telephone methods/applications and will only be known by the staff in charge of the facilities of our Company responsible for the supply of products and services that concern you and by trusted external parties to which we entrust certain tasks of a technical or organisational nature, that operate as data processors on our behalf (companies for the delivery of goods, such as couriers and forwarding agents; postal service companies for the transmission, enveloping, transport and sorting of communications to customers; banks; computer and telecommunications services; or storage companies). In addition, your data may be disclosed, as law may require, to the Public Security Authority for the purposes of performing the services covered by the contractual relationship.

Your data may also be processed, for the purposes referred to in point B above, not only by our Company, but also by companies specialising in information and commercial promotion services, market research and surveys on the quality of services and customer satisfaction (which will operate as data processors).

In relation to the aforementioned processing, your data will be retained in full compliance with the security measures provided for by the privacy legislation and will be retained: i) for the purposes referred to in point A for the time required by the legislation on the retention of documents for administrative, accounting, tax, contractual purposes (as a rule, 10 years), ii) for the purposes referred to in point B for two years and will end when you terminate your relationship with our Company; after the termination of this relationship, your data will no longer be used.

### **YOUR RIGHTS**

The privacy policy (Articles 15-22 of the Regulation) grants you the right to access the data concerning you at any given time, as well as the right to the correction and/or integration thereof, if inaccurate or incomplete; the right to the erasure or limitation of the processing thereof, if the conditions are met; the right to object to the processing of your data for reasons connected to your individual circumstances; the right to the portability of the data supplied by you, where processed in an automated manner for the contractual services requested by you, within the limits established by the Regulation (Article 20). You also have the right to withdraw your consent with respect to the processing of your data for the purposes referred to in point B at any time and without incurring any costs: if you wish to do so, please contact the "Data Protection Officer", whose details are below.

Tenute del Cerro S.p.A. ([www.tenutedelcerro.it](http://www.tenutedelcerro.it)) is the data controller, with headquarters at Via Grazianella 5 - Fraz. Acquaviva - 53045 Montepulciano (SI).

The "Data Protection Officer" is at your disposal for any queries or clarifications: for this purpose, you can contact him/her at the specified offices of Tenute del Cerro S.p.A., at the email address [privacy@tenutedelcerro.it](mailto:privacy@tenutedelcerro.it), where you can contact him/her not only to exercise your rights, but also to obtain the updated list of categories of data recipients. You are also entitled to lodge a complaint with the Italian Data Protection Authority, when deemed necessary for the protection of your personal data and rights thereof. This right remains unaffected.

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1. This data may also reveal, not only state of health, but also racial and ethnic origin, beliefs of a religious or philosophical nature, political opinions, trade union membership, as well as genetic or biometric data, all of which are aimed at uniquely identifying a person. In specific cases, where strictly necessary for the purposes and on the basis of the aforementioned premises, data relating to any criminal convictions or offences may also be collected and processed by our company
  2. The complete and updated list of all companies belonging to the Group can be consulted on the Unipol Gruppo S.p.A. website, [www.unipol.it](http://www.unipol.it)
  3. We remind you that, where the processing of your data is based on your express consent, such consent may be revoked without prejudice to the lawfulness of the processing based on the consent given before the revocation. We would also like to inform you that the processing of personal data, which is not of a specific category, may in any case be legitimately carried out by Tenute del Cerro, without your consent, for the performance of contractual services requested or envisaged by you, for the fulfilment of obligations imposed by law upon Tenute del Cerro, for the performance of administrative/accounting activities related to the management of the insurance relationship and for the pursuit of other legitimate interests of Tenute del Cerro and the Unipol Group Companies (e.g., in terms of fraud prevention and the fight against fraud and/or the defence of rights in court).

**DECLARATION OF ACKNOWLEDGEMENT OF THE POLICY AND CONSENT TO THE PROCESSING OF PERSONAL DATA FOR  
MARKETING PURPOSES**

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The undersigned....., hereby confirms having read and accepted the policy regarding the processing of personal data and associated rights.

Furthermore, by ticking either of the boxes below, the undersigned expresses/denies his/her consent to the processing of his/her personal data (excluding data that falls into special categories) by the Data Controller, Tenute del Cerro S.p.A., for the performance of remote marketing communications relating to its products or services, of companies belonging to the Unipol Group and/or third-party companies, specifically, the sending of newsletters and advertising material, direct sales, the performance of market research and/or satisfaction surveys on the quality of the products purchased or commercial communications by means of remote communication techniques, including automated contact methods (such as SMS, MMS, fax, automated telephone calls, emails, messages on web applications) and traditional contact methods (such as paper mail and telephone calls with an operator service).

I consent

I do not consent

Date .....

Signature .....