

Information regarding clients pursuant to article 13 of EU Regulation 2016/679

Preamble

In compliance with EU Regulation 679/2016, containing provisions relating to the protection of personal data, **Delphina SpA**, with administrative headquarters in Palau - 07020, Loc. Cala di Lepre (hereinafter referred to as "Delphina") in its capacity as Owner/Data Controller, is required to provide certain information regarding the use of personal data. Given the above, Delphina's compliance with the current rules on transparency and mandatory publication of data and documents remains valid.

Data source and type



Personal data acquired by Delphina may be collected:

- directly from the interested party
- from public-access sources (e.g. documents published in the Chamber of Commerce, etc.)
- from third parties in cases in which Delphina acquires data from external organizations for the purposes of sending information, carrying out market research or presenting offers regarding products and/or services.

In cases in which data has not been collected directly from the interested party, this information is provided at the time of registration and in any case not later than the first possible communication.

Where the existing relationship requires it, the data processed is personal data relating to individuals and, where appropriate, particular data such as sensitive/judicial data. It is possible that, in order to fulfill specific obligations related to the management of the relationship (such as accounting, social security, welfare and tax, as well as in the case of management of a possible legal dispute, out-of-court and/or consultant advice), Delphina may be in possession of data identified in legal terms as "sensitive" (such as data from which racial and ethnic origin, political opinions, membership of parties, unions, religious, philosophical, trade union, and political associations or organizations may be inferred as well as state of health and judicial data). However all this data is processed for the pursuit of institutional purposes in compliance with the aforementioned law and the confidentiality obligations which Delphina commercial activities have always respected.

Retention period



Data is kept only for the period of time necessary for the purposes for which they are processed or in accordance with national and European Community regulations, laws and rules and with which Delphina has to comply (e.g. accounting and tax regulations, etc.).

Consent and consequences of failure to grant consent



Consent is mandatory for data relating to the processing procedure that Delphina has to carry out in order to fulfill its obligations towards the interested party with regard to the existing relationship/contract as well as legal obligations, rules and regulations. Failure to provide such data may make it impossible for Delphina to proceed with the existing relationship

Consent is not mandatory for all other purposes and, even if granted may be revoked at any time by the interested party.

The purposes for which the **provision of data is mandatory** are marked with the following symbol



The purposes for which it is **NOT mandatory to provide data** are marked with the following symbol



Purposes of data processing



Data is processed as a normal part of Delphina's commercial activity and according to the following institutional purposes. If the owner intends to further process the personal data for a different purpose than that for which it was collected, it shall provide all necessary information to the interested party in advance.

- 1) Provision of services requested by the interested party in the context of the existing relationship/ contract (for example: quotation, hospitality, services provided within the structure, etc), purposes linked to related Delphina services, including those of a related external nature, (tenders, ticket offices, excursions, etc.), including purposes of legitimate related interest, or administrative purposes (e.g. invoicing), accounting and tax obligations carried out for purposes of public institutional character, transposition and management of obligations provided for by national and European Community legislation, laws and regulations as well as by provisions issued by authorities empowered by the law and by supervisory and control bodies (e.g. Public Security communications), management of any judicial, extrajudicial litigation and consultancy activity. Data may be subject to anonymous processing for statistical activities aimed at carrying out institutional activities and/or improving the services offered.
- 2) Reception and sending of messages, delivery and sending of mail (as well as parcels and gifts), passing of phone calls to rooms (during stays within hospitality structures).
- 3) The sending via e-mail, mail and/or SMS and/or telephone contacts of newsletters, offers, commercial communications, gifts and/or advertising material regarding products or services offered by the Data Controller/Owner and gathering of information about the degree of satisfaction regarding quality of services, directly or through third parties with whom Delphina has established collaboration agreements.



Legal position

Data is processed for the carrying out of the purposes as defined above, within the terms provided for by national and community legislation, laws and regulations with which Delphina has to comply. Pursuant to EU Regulation 2016/679, the updated explicit regulatory references that provide for the obligations or tasks on the basis of which the processing of sensitive and judicial data may be processed are available from the Data Controller. This data may be communicated, within the context of the carrying out of the intended purposes only where required by law or regulation and may be done without prejudice to the communication or dissemination of data required, in accordance with the law, by police forces, judicial authorities, information and security bodies or other public entities, for purposes of defence or security of the state or prevention, ascertainment or repression of crimes.

Data processing methods

Data is processed using manual, computerized and telematic instruments according to protocols strictly linked to the carrying out of the purposes and in order to guarantee the security and confidentiality of the data. Archiving is carried out both electronically and on paper. Below is a list of essential information:

- The collection of personal data is limited to the minimum necessary for each specific section of the processing procedure
- The processing of personal data is limited to the purposes for which it was collected
- The storage of personal data is limited to the minimum necessary for each specific purpose of the processing procedure
- Personal data may be disclosed to commercial third parties, both in Italy and abroad, exclusively for the management of services offered to Delphina customers
- Personal data is not sold or rented

Limits of data distribution and interested parties

Within limits strictly relevant to the aforementioned purposes, personal data collected by Delphina may also be disclosed to the following subjects or categories of subjects. For purpose n.1 the communication of data resulting from a legal or contractual obligation or as a necessary requirement for the conclusion of a contract. In the absence of these communications, the relationship/contract may not be completely fulfilled. In addition, data may also be transferred to foreign countries, following needs evaluation in the case of a foreign client.

- Subjects with whom communication is required by law, by regulation or by national and community legislation as well as for the execution of contractual or pre-contractual obligations
- Credit Institutions, Insurance Companies and similar bodies for the execution of contractual or pre-contractual obligations
- Companies gathering data regarding the quality of services provided, companies carrying out the transmission, packaging, transport and distribution of communications to interested parties
- Legal and accounting consultants for the purpose of studying and resolving any legal problems related to existing contractual positions and external studios specialized in the management of accounting and tax aspects
- Consultants and professionals (technicians, designers, etc) or companies that work together with Delphina in order to provide requested services or sell purchased products (e.g. transport companies, cooperatives, associated companies, parent companies, etc.)
- Related companies for purposes related to existing relations with Delphina
- Public Administrations and Bodies among whose tasks are those of health and safety in the workplace
- Companies that collaborate with Delphina for marketing and communication activities (only for purpose n.3)

Rights of the interested parties

At any time the interested party may exercise his/her rights regarding the Owner, pursuant to EU Regulation 2016/679 through the following addresses: privacy@delphina.it - Delphina S.p.A. with administrative headquarters in Palau - 07020, Loc. Cala di Lepre (for written communications). To ensure the proper exercising of said rights, the interested party must identify himself unequivocally. Delphina undertakes to provide feedback within 30 days and if it is impossible to comply with these deadlines, to justify any extension of the deadlines. The response will be free of charge except in cases where there are no grounds for complaint (e.g. there is no data pertaining to the complainant) or excessive requests (e.g. repetitive over time) for which a fee may be charged not higher than the costs actually incurred for completion of the specific request. The interested party may also send a complaint to the Supervisory Authority. If a personal data breach suffered by Delphina is ascertained, within 72 hours of knowledge of the fact, the Data Controller will proceed with notification of the violation to the competent Supervisory Authority and will also communicate the event to the interested party, except in cases of exclusion as covered by the relevant legislation.

Right to know

- origins of the personal data
- categories of data processed
- purposes and means of processing
- retention period
- logic/protocol applied in case of processing carried out using secondary electronic instruments
- identification details of the Owner and Data Controller
- Owner and Data Controller and subjects and categories of subjects to whom personal data may be communicated or who may come into contact with them in the role of manager or those responsible in third party countries
- the existence of profiling processes

Right to request

- confirmation of the existence or otherwise of their personal data and that such data be made available in an intelligible form
- updating, rectification, integration and limitation of said data
- cancellation, transformation into anonymous form or blocking of data processed in violation of the law (including those for which retention is not necessary with regard to the purposes for which they were collected or subsequently processed)
- attestation that the operations referred to in the points above have been brought to the attention of those to whom the data have been communicated or disseminated, except in the case where so doing proves impossible or involves a use of means clearly disproportionate in relation to the rights guaranteed by Delphina
- copies of the data being processed

Right to objection

- to the processing of personal data concerning the interested party including profiling for legitimate reasons even if pertinent to the reason for their collection
- to the processing of personal data concerning the interested party for the purposes of: sending advertising material, commercial communications, carrying out market research and direct sales
- to the processing of data for statistical and/or scientific or historical research purposes, except in cases of public interest in the processing thereof