
Privacy Policy of the site

www.campingwaikiki.com

1. Introduction

Dear User(s),

We hereby notify you that consultation and navigation on this website involves the processing of your personal data. We also inform you that the processing of the personal data communicated is based on the principles of fairness, lawfulness, transparency and the protection of confidentiality and your rights as data subject(s).

We inform you that the information provided on the basis of this privacy policy relates to the processing carried out from this website, but does not concern other websites, pages or online services that can be reached and consulted by the user through hyperlinks that may be published on the site, but that referred to resources external to the domain of the site owner.

When the user continues to navigate or agrees to the service proposals contained on the various parts of the site (*filling out the 'accommodation price', 'camping price', 'online check-in & payment', 'contact', 'jobs', 'newsletter' ...*), we acquire this general information as to processing, as well as any specific information related to processing for different and specific purposes, and the user gives his consent to the processing.

2. Controller

The Controller of personal data processing is the Company Finter S.r.l., having its registered office at Galleria Borromeo no. 3 - postcode 35137 Padua - VAT no. 01993520285; e-mail addresses: privacy@campingwaikiki.com, telephone +390421980186 and fax +390421378040

3. Types of data processed and purposes of the processing

Navigation data

During their regular operation, the IT systems and software procedures devoted to operate this web site acquire some personal data of which the transmission is implicit in the use of Internet communication protocols. This is information that is not collected to be associated with identified data subjects, but which by its very nature could, through processing and association with data held by third parties, allow for users to be identified.

This category of data includes, for example, IP addresses or domain names of computers or other devices used by users who connect to the site, URI/URL (Uniform Resource Identifier/Locator) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numeric code indicating the status of the response given by the server (successful, error, etc.) and other parameters related to the user's operating system and IT environment. These data, necessary for the use of the website, are also processed to obtain anonymous statistical information on the use of the website and to check that it functions properly; these data are erased immediately after they are processed (except for data that must be kept due to legal obligations including the possible need for the prosecutorial Authorities to detect a criminal offence).

Cookies

This website uses cookies and similar technologies to ensure that the procedures function properly and to improve the experience of the use of online applications.

Please be informed that:

- I) the web site *www.campingwaikiki.com* does not use profiling cookies;
- II) the web site *www.campingwaikiki.com* also allows for 'third party' cookies to be sent;
- III) by accessing the full statement on the management of cookies displayed in the footer of the home page of the site, the following are indicated: the technical and analytics cookies used, the

ability to choose which specific cookies to use; as well as the possibility to deny consent to the use of cookies;

IV) by continuing to navigate through access to another area of the site or by selecting an element thereon, you are consenting to the use of cookies.

Please refer to the full statement on cookies displayed in the footer of the home page for more information.

Navigation data and Cookies are common personal data, necessary for the use of the website, and are processed for the following purposes:

- for the proper functioning of the website;
- to obtain statistical information on the functionality of the site (most visited pages, number of visitors at a given time or day, geographical areas of origin, etc.);
- for the purposes of advanced navigation and content management.

Data voluntarily provided by the User

The optional, explicit and voluntary sending of messages to the contact addresses of the Controller, as well as the filling out and sending of the contact forms on the site www.campingwaikiki.com entail the acquisition of the sender's contact data, necessary for a response thereto, as well as all personal data contained in the communications (also including sensitive data (the former Article 4, letter (d), first paragraph of Italian Legislative Decree 196/03), or, in any case, special categories of data (pursuant to Article 9 of Regulation 2016/679)).¹

Data voluntarily provided by the User are processed for the following purposes:

- a) for sending informational material or other communications after the user has filled out the special forms or contact forms available on the web site or sent an e-mail to the addresses indicated on the site and for the related and further purposes of processing the request;
- b) for the offer of the service requested after the user has filled out the special form or contact form on the website;
- c) to acquire and confirm your service reservation (accommodation and ancillary services);
- d) to comply with the obligations set out in the *'Testo unico delle leggi di pubblica sicurezza'* ('Consolidated Text of Italian Public Safety Laws') and the related legal notices;
- e) to comply with applicable administrative, accounting and tax obligations;
- f) after obtaining your consent, which can be revoked at any time, to speed up the registration procedures in the event of your subsequent stays at our establishment;
- g) after obtaining your consent, which can be revoked at any time, to carry out the function of receiving messages and telephone calls addressed to you during your stay;
- h) after obtaining your consent, which can be revoked at any time, for commercial communication purposes - to be carried out using traditional communication methods, such as physical mail and/or operator-assisted calls, or through automated systems (pre-recorded telephone calls, e-mails, newsletter, fax, SMS, MMS);
- i) for legal protection purposes.

¹ The processing carried out by virtue of browsing and consulting the site may concern: common personal data (for example, personal data, tax codes, contact details, telephone numbers and/or e-mail addresses, navigation data, cookies), as well as (and only for data voluntarily provided by the user): sensitive data (the former Article 4, letter (d), paragraph 1 of Italian Legislative Decree 196/03), or, in any case, special categories of data (pursuant to Article 9 of EU Regulation 2016/679) such as, in particular, personal data suitable for revealing racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership to parties, unions, associations or organisations of a religious, philosophical, political or trade union nature, as well as personal data suitable for revealing health status, life and sexual orientation; or judicial data relating to criminal convictions or offences, where communicated contemporaneously by the data subject/user pursuant to Article 10 of EU Regulation 2016/679.

4. Legal basis of the processing

This site processes the data provided primarily on the basis of the **consent** of users/navigators. By using, consulting the site or by agreeing to service proposals contained in the various parts of the site, the user approves of this policy and gives his or her consent to the processing of personal data in relation to the methods and purposes described herein.

Explicit consent relating to the purpose of the service offered are collected through the communication or service request forms.

It is specified that the consent of the data subject is not required for the processing of common personal data, pursuant to Article 6 of EU Regulation 2016/679, in particular if: processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6, paragraph 1, letter (b) of EU Regulation 2016/679); processing is necessary for compliance with a legal obligation to which the controller is subject (Article 6, paragraph 1, letter (c) of EU Regulation 2016/679); processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data (Article 6, paragraph 1, letter (f) of EU Regulation 2016/679). For the processing of sensitive data (the former Article 4, paragraph 1, letter (d) of Italian Legislative Decree 196/03), or, in any case, special categories of data (pursuant to Article 9 of EU Regulation 2016/679), refer to the provisions of Article 9 of EU Regulation 2016/679.

5. Methods for processing and storing data

The Controller, and each of any categories of external Processors as indicated below, will manage and store personal data collected through the use of the site and its various functions that can be activated at the user's request with automated and/or paper-based tools, for the time strictly necessary to achieve the purposes for which they were collected or voluntarily communicated by the user and as better specified below.

The processing of personal data will be carried out in order to guarantee adequate security and confidentiality and to prevent unauthorised access to or use of personal data. Therefore, personal data will be processed and stored in full compliance with the principles of necessity, data minimisation and limited storage period, through the adoption of technical and organisational measures appropriate to the level of risk of the processing and for a period of time not exceeding the achievement of the purposes for which they are processed, however for the period required by law.

In particular, the Controller will store the personal data provided as follows:

- for navigation data: these data are erased immediately after their processing (except for log data that must be kept for legal obligations including the possible need for prosecutorial Authorities to detect a criminal offence);
- for cookies: please refer to the details of the statement on 'Cookies' displayed in the footer of the home page;
- for other data:
 - in relation to the purposes referred to in point 3, letters (a) and (b), the processing will be carried out for the time necessary to process your requests for information and/or supply of services, except for the data that are processed for the additional purposes indicated in point 3 (for example, compliance with a legal obligation);
 - in relation to the purposes referred to in point 3, letter (c), the processing will cease at your departure, except for the data that are processed for the further purposes indicated in point 3 (for example, compliance with a legal obligation);

- in relation to the purposes referred to in point 3, letter (d), the data will not be stored, unless you provide consent for the purpose referred to in point 3, letter (f);
- in relation to the purposes referred to in point 3, letter (e), for the entire duration of the contractual relationship, as well as, once the latter has ended, for the time established by the applicable accounting and tax laws and, in any case, according to the limitation period for the rights arising from the contract (and, therefore, in general, no later than ten years after the termination of the relationship itself);
- in relation to the purposes referred to in point 3, letter (f), the data will be stored for a maximum period of 10 years and will be used when you are our guest again;
- in relation to the purposes referred to in point 3, letter (g), the processing will cease upon your departure;
- in relation to the purposes referred to in point 3, letter (h), the data will be stored for as long as deemed useful for the marketing purposes indicated above, and in any case not later than 48 months from their acquisition, without prejudice to the exercise of the rights of the data subject referred to in point 10 of this policy, inter alia, to object to the processing of data, also for the aforementioned purposes, and to obtain their erasure, and without prejudice to the withdrawal of consent.

6. Subjects or categories of subjects to whom personal data may be communicated or who can learn about them and process them as processors or persons authorised to process them

The subjects or categories of subjects to whom your personal data may be communicated or who can obtain them and process them for the above purposes are:

- the internal authorised personnel of the Controller, to whom specific instructions have been given in writing;
- the (internal and external) processors, specifically identified by the Controller and to whom specific instructions have been given in writing, also belonging to the categories indicated below;
- professionals and companies with which the Controller collaborates for the provision of administrative, accounting, tax and employment services that carry out these activities on behalf of the Controller;
- the tax authority (*Agenzia delle Entrate* - Italian Revenue Agency) and entities, funds, including those for social security and assistance (*INPS* - Italian National Institute for Social Security, *INAIL* - Italian National Institute for Insurance against Workplace Accidents), as well as private insurance institutions;
- banking and insurance institutions, also for the purposes of legal and insurance protection;
- trade union organisations to which employees or collaborators have given specific mandates;
- trade associations or business organisations of which the Controller is a member;
- IT consultants and service companies;
- lawyers and legal advisors;
- as well as all other external processors.

There is an absolute ban on the disclosure of data.

To obtain more information about the lists of subjects to whom the above data will be communicated, please contact the Controller at the email address privacy@campingwaikiki.com

7. Transfer of data outside the EU and automated decision-making processes

The data processed are not subject to transfer outside the EU, nor are they subject to automated decision-making processes.

8. Mandatory or optional nature of data communication and consequences in the event of a refusal to communicate data

The communication of your common personal data is:

- optional for the purposes referred to in point 3, letters (a), (b) and (c), and in particular for requesting information and/or services and/or to receive and/or confirm your reservation; however, any refusal to communicate the aforementioned data may make it impossible to meet your request or provide the requested service and necessarily entails the impossibility of receiving and/or confirming the reservation, as the communication is essential and necessary for this purpose;
- mandatory as regards the purposes referred to in point 3, letter (d); if you refuse, our establishment will not be able to host you;
- mandatory as regards the purposes referred to in point 3, letter (e); if you refuse, we will not be able to provide you with the requested services;
- optional for the purposes referred to in point 3, letters (f) and (g); if you refuse, we will not be able to proceed with what is indicated in the aforementioned point 3, letters (f) and (g);
- optional for the purposes referred to in point 3, letter (h) (commercial communication purposes); however, any refusal to provide data for this specific processing is of no consequence to the obligation and the fulfilment of the other purposes indicated at point 3, and in particular in relation to all that is related to the fulfilment of the contract for the supply of services, but only entails the impossibility of proceeding with the aforementioned commercial communications.

Even where your common, sensitive personal data and in any case the data pursuant to Article 9 of EU Regulation 2016/679, is optionally communicated, any refusal to communicate the aforementioned data or withdrawal of consent to the subsequent processing could make it impossible for the Controller to provide certain services, as described above, and could also affect the experience of navigation on the site.

The user is granted the right to refuse consent or to withdraw the consent provided at any time (by sending an e-mail to the address of the Controller indicated above or using specific browser settings for cookies or through the links indicated for third-party cookies).

9. (Further) rights of the data subject

In accordance with Articles 15-22 of European Regulation 2016/679 (GDPR), each Data Subject has also the right to request access to personal data concerning him or her, the rectification of inaccurate data and, if the case may be, to have his or her incomplete personal data completed, the erasure thereof or restriction of processing where the conditions for such restriction are met, as well as to object to their processing thereof in the scenario provided therein, including the right to object to the processing of data for direct marketing purposes, including profiling to the extent that it is connected to such direct marketing, which can be exercised at any time (Article 21, paragraph 2, GDPR), as well as the right to data portability concerning his or her data only if subject to automated processing based on a contract or consent.

The right to withdraw the consent given for the processing purposes requiring it, is also provided, without prejudice to the lawfulness of the processing carried out up to the time of the withdrawal.

For requests to exercise his or her rights, each data subject can contact the Controller at the contact details indicated above.

Lastly, we remind you that each Data Subject has also the right to lodge a complaint with the Personal Data Protection Supervisor (www.garanteprivacy.it).

This policy is effective from 25.05.18.
