

INFORMATION* ON THE PROCESSING OF PERSONAL DATA pursuant to Articles 13/14 of EU Regulation 2016/679 "General Regulation on the protection of personal data", of Legislative Decree 201/2018 and of any general authorizations issued by the Data Protection Authority of personal data.

Dear guest,

VILLA FELTRINELLI SRL single-member company with registered office in Gargnano (BS), Via Rimembranza, 38-40, (VAT No. 02177040983), as a **data controller**, would like to inform you about the use of the personal data you provide when making reservations at the Villa Feltrinelli Restaurant.

The **data controller** company, pursuant to articles 13/14 of EU Reg. 2016/679, informs you that they will process your personal data, also of a particular nature, in compliance with the provisions of the law.

According to the Regulation, the processing of your personal data (personal data, contact data, bank data and/or data relating to payment instruments, e-mail, mobile phones, data relating to food tastes and preferences, data relating to intolerances or other details, additional data necessary for booking, etc.) will be based on principles of correctness, lawfulness, transparency and protection of confidentiality.

Purpose, legal basis, processing methods and rights of the data subjects

We inform you that the personal data (possibly also of a particular nature) provided by you will be processed for the management of your reservation and for the provision of the requested restaurant service.

Legal basis

The legal basis of this processing is represented by the need to fulfill the contractual and/or pre-contractual obligations pursuant to art. 6 paragraph 1 letter b of EU Reg. 2016/679, as well as the need to fulfill legal obligations pursuant to Art. 6 paragraph 1 letter c of EU Reg. 2016/679 and its relative consent pursuant to art. 6 paragraph 1 letter a in the event of particular data specified in the reservation form.

We inform you that the provision of your personal data is essential for managing the reservation and providing the requested restaurant service; in the event of failure to provide the data, the data controller may not be able to provide all or part of the requested services.

Methods of processing

Pursuant to art. 4 paragraph 1 of EU Reg. 2016/679, the personal data provided by you and referable to you may be processed using paper, electronic and/or magnetic means for the time necessary to fulfill the contractual and/or legal obligations.

Personal data will not be processed using fully automated methods, they will not be disseminated, but they may be communicated and/or may come to the attention of specially trained operators who are part of the company staff and/or external subjects, such as managers or data controllers who collaborate with the company; by way of example but not limited to the following subjects:

- companies, firms and/or freelancers for personal data processing and management activities;
- companies, firms and/or freelancers for consultancy and/or management activities in technical, tax, business, IT fields; in this regard, that note that E-Group Srl company is appointed for the organization management and database collection;
- other subjects to whom the communication should be necessary for the correct and complete performance of the contractual relationship and/or to fulfill legislative obligations and/or to pursue the specified purposes.

The complete list of data processors is available at the headquarters of the data controller.

Rights of the data subjects

We also inform you that you have the right to obtain access to your personal data from the data controller company (i.e. VILLA FELTRINELLI SRL single-member company) as well as the rectification, erasure, restriction of processing, right to object to processing of personal data and the right to data portability. The rights referred to in this paragraph may be exercised as provided for by the articles 15,16,17,18,20,21 of EU Reg. 2016/679 which we will attach to this information for your convenience. All rights may also be exercised individually against the company identified above; moreover, it is your right to lodge a complaint with the supervisory authority provided for by the national law in force.

For any clarification and for exercising the above rights, please contact the data controller company (VILLA FELTRINELLI SRL unipersonale) in the person of its pro tempore legal representative, sending a communication to the headquarters in Gargnano (BS), ITALY, Via Rimembranza 38-40 or calling 0365/798000 or writing an email to management@villafeltrinelli.com

VILLA FELTRINELLI SRL single-member company

*This document integrates and completes the information that was already known by the data subject

EXTRACT FROM EU REGULATION 679/2016

Art. 15 GDPR Right of access by the data subject The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information: a) the purposes of the processing; b) the categories of personal data concerned; c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations; d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing; f) the right to lodge a complaint with a supervisory authority; g) where the personal data are not collected from the data subject, any available information as to their source; h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.¹The controller shall provide a copy of the personal data undergoing processing. ²For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. ³Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.

Art. 16 GDPR Right to rectification The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

Art. 17 GDPR Right to erasure ('right to be forgotten') 1. The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies: a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; b) the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2), and where there is no other legal ground for the processing; c) the data subject objects to the processing pursuant to Article 21(1) and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2); d) the personal data have been unlawfully processed; e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject; f) the personal data have been collected in relation to the offer of information society services referred to in Article 8(1). 2. Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data. 3. Paragraphs 1 and 2 shall not apply to the extent that processing is necessary: a) for exercising the right of freedom of expression and information; b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; c) for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3); d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or e) for the establishment, exercise or defence of legal claims.

Art. 18 GDPR Right to restriction of processing 1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies: a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data; b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead; c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; d) the data subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override those of the data subject. 2. Where processing has been restricted under paragraph 1, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. 3. A data subject who has obtained restriction of processing pursuant to paragraph 1 shall be informed by the controller before the restriction of processing is lifted.

Art. 20 GDPR Right to data portability 1. The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where: a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) or on a contract pursuant to point (b) of Article 6(1); and b) the processing is carried out by automated means. 2. In exercising his or her right to data portability pursuant to paragraph 1, the data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. 3. The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to Article 17. ²That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. 4. The right referred to in paragraph 1 shall not adversely affect the rights and freedoms of others.

Art. 21 GDPR Right to object 1. The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her which is based on point (e) or (f) of Article 6(1), including profiling based on those provisions. ²The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. 2. Where personal data are processed for direct

marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. 3. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes. 4. At the latest at the time of the first communication with the data subject, the right referred to in paragraphs 1 and 2 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information. 5. In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, the data subject may exercise his or her right to object by automated means using technical specifications. 6. Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.