

PRIVACY NOTICE FOR PERSONAL DATA PROCESSING

under Articles 13 and 14 of the General Data Protection Regulation (EU) 679/2016 ("GDPR")

last update: 5 September 2022



VIGNAMAGGIO

	JOINT DATA CONTROLLERS FOR CARRYING OUT MARKETING PURPOSES	Villa Vignamaggio Soc. Agr. S.r.l. (" Vignamaggio ") Tax Code VAT no. 04072370481 via Petriolo 5 -50022- Greve in Chianti (FI), Italy PEC vignamaggio@pec.vignamaggio.com Email amministrazione@vignamaggio.com	Petriolo S.r.l. (" Petriolo ") VAT No. 06642280488 Registered office: Corso Porta Nuova 15, 20121, Milano PEC petriolo@pec.net Email eshop@vignamaggio.com
	AUTONOMOUS DATA CONTROLLERS FOR THE MANAGEMENT OF ONLINE BOOKINGS	Villa Vignamaggio Soc. Agr. S.r.l. Tax Code VAT no. 04072370481 via Petriolo 5 -50022- Greve in Chianti (FI), Italy PEC vignamaggio@pec.vignamaggio.com Email amministrazione@vignamaggio.com	Petriolo S.r.l. VAT No. 06642280488 Registered office: Corso Porta Nuova 15, 20121, Milano PEC petriolo@pec.net Email eshop@vignamaggio.com
	DATA CONTROLLER FOR THE MANAGEMENT OF SALE AND POST SALE-RELATED ISSUES	Petriolo S.r.l. VAT No. 06642280488 Registered office: Corso Porta Nuova 15, 20121, Milano PEC petriolo@pec.net Email eshop@vignamaggio.com	

To the extent of the present privacy notice, Vignamaggio and Petriolo shall each be defined as "**Controller**" and, jointly, as the "**Controllers**" or "**Joint Controllers**" or by the words "we" or "us", while the words "you" and "**Data Subject**" shall define and refer to the data subject of the personal data processing hereof.

	SOURCE FOR DATA COLLECTION The personal data (the " Personal Data " or the " Data ") of the users collected/submitted by browsing/accessing to/making purchases on this website (the " Website "), cookies (small text files containing a given amount of information exchanged between the Website and the browser in use) and localStorage (as described in the relevant Cookies and localStorage policies available at the Website)
	DISCLAIMER – PERSONAL DATA NOT OBTAINED FROM THE DATA SUBJECT Further to the above, Vignamaggio and Petriolo may also receive – from time to time - the personal data autonomously collected by the company Babylonstoren (Pty) Ltd (" BTSA "), company of the group to which the Controllers belong, seated in South Africa Tax Code VAT no. 4060255587 relating to BTSA clients when they stay at BTSA accommodation and/or use BTSA services (e.g. restaurants) located in the Republic of South Africa. Notably, BTSA is considered as a Data Controller under the GDPR in relation to the following categories of the data autonomously collected from/provided by its clients: <ul style="list-style-type: none"> • <u>Personal Data</u>: name, surname; • <u>Contact Data</u>: e-mail, phone number, residential and/or delivery address, country of residence, ZIP/Postal Code; Vignamaggio and Petriolo receive such personal data of the BTSA customers in pursuance of art. 14 of the GDPR for the purpose of marketing Vignamaggio products and services and of partners' pertaining to the following categories: fine living, accommodations, leisure, wines, restaurants; All the personal data of the BTSA customers subsequently provided to Vignamaggio and Petriolo have been duly collected by BTSA itself in accordance with the relevant privacy notice served on those customers. This is in pursuance of the applicable provisions set forth in the GDPR and the data protection legislation in force for the Republic of South Africa and is subject to those data subjects providing their express consent for such processing by Vignamaggio and Petriolo.

PROCESSING OF DATA CARRIED OUT BY VIGNAMAGGIO AND PETRIOLO AS JOINT DATA CONTROLLERS FOR MARKETING PURPOSES				
1.A CATEGORIES OF DATA	1.1.A PURPOSES OF THE PROCESSING	1.2.A MANDATORY OR OPTIONAL PROVISION OF DATA	1.3.A LEGAL BASIS FOR THE PROCESSING	1.4.A PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED
<ul style="list-style-type: none"> • PERSONAL DATA name, surname • CONTACT DATA e-mail, telephone number, domicile address, country of residence, ZIP/postal code 	Customer registration and relevant services Your Personal Data may be processed for your registration on the Website, in order to provide you with all the benefits reserved for registered customers. Your customer registration will allow you to receive special services reserved for registered customers, such as, without limitation, private sales, invitations to events and products' presentations, participation to promotional initiatives and/or prize competitions.	Optional. In the event of failure to provide the Data, Vignamaggio and Petriolo will not be able to manage your customer registration on the Website. It is your right at any moment to opt free-of-charge to cancel your customer registration by sending an e-mail to amministrazione@vignamaggio.com	Performance of a contract to which you as the Data Subject is party (art. 6, par. 1, lt. b) GDPR).	Vignamaggio and Petriolo undertake to delete your Personal Data within 10 years from the date of the cancellation of your registration on the Website.

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VIGNAMAGGIO

<ul style="list-style-type: none"> PERSONAL DATA name, surname CONTACT DATA e-mail, telephone number, domicile address, country of residence, ZIP/postal code PURCHASE DATA date of purchase, type and quantities of purchased product(s) 	<p>Marketing and commercial purposes</p> <p>The data may be processed for direct marketing purposes, such as sending newsletters, information and commercial communications, updates on the latest launches, offers and promotions relating to the products and services of Petriolo and Vignamaggio and partners operating in the fields of: wellness, accommodation, leisure, wines, restaurants, tours and events. The data may also be processed to perform market research, statistical analysis or other research to improve the products and services of Petriolo and Vignamaggio and of the partners belonging to the following categories: wellness, accommodation, leisure, wines, restaurants, tours and events, as well as for customer satisfaction surveys. We may carry out these activities through our newsletter, via email, even by automated means (SMS, social media). The data subject can choose to receive such communications exclusively by non-automated means (for example, non-automated telephone calls or by post) by writing an e-mail to amministrazione@vignamaggio.com</p>	<p>Optional.</p> <p>In the event of failure to provide the Data, Vignamaggio and Petriolo will not be able to keep you regularly updated about its offers and promotions reserved for registered customers, as well as to use your Personal Data for market research and statistical analysis or customer satisfaction surveys.</p> <p>If you have granted your consent, you may withdraw it at any time by clicking onto the "unsubscribe" link included in our direct marketing e-mail received or by sending an e-mail to amministrazione@vignamaggio.com</p>	<p>Your express consent to the processing of Personal Data (art. 6, par. 1, lt. a) GDPR).</p>	<p>Vignamaggio and Petriolo will no longer use and delete your Personal Data processed for (i) marketing and other commercial purposes or (ii) for the purpose improving relations with its customers, within 24 months from the date of your last purchase.</p>
<ul style="list-style-type: none"> BROWSING DATA log files, IP addresses, domain names of users' terminals, URI addresses, server request times and methods, server responses, other parameters concerning the operating system and the IT environment of the Website user 	<p>Purposes concerning the analysis of the Website browsing</p> <p>Your Personal Data may be processed for the collection of anonymous statistical data on the use of the Website by the users, as well as for controlling the Website operation.</p>	<p>Optional.</p> <p>The failure to provide the Data, carried out by disabling cookies/localStorage in the browser (see here our cookie policy), could prevent you from accessing all the Website functions.</p>	<p>The legitimate interest of the Joint Controllers to operate and control the Website and to obtain data on its usage, or your consent</p>	<p>see here our cookie policy</p>

PROCESSING(S) OF DATA CARRIED OUT BY PETRIOLO AS DATA CONTROLLER FOR THE PURPOSES OF MANAGEMENT OF THE SALE AND POST-SALE RELATED ISSUES

1 B CATEGORIES OF DATA	1.1 B PURPOSES OF THE PROCESSING	1.2 B MANDATORY OR OPTIONAL PROVISION OF DATA	1.3 B LEGAL BASIS FOR THE PROCESSING	1.4 B PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED
<ul style="list-style-type: none"> PERSONAL DATA name, surname CONTACT DATA e-mail, telephone number, domicile/shipping/billing address(es), country of residence, ZIP/postal code PURCHASE DATA date of purchase, type of purchased product(s) 	<p>Management of the sale and post-sale related issues</p> <p>Your Personal Data may be processed for the performance of the sale (e.g. taking payment, shipping/delivery of the products, invoicing, etc.), as well as for the related post-sale services like returns, changes of products, refunds, etc.</p>	<p>Optional.</p> <p>In the event of failure to provide the Data, Petriolo will not be able to complete the sale and/or deal with post-sale related issues concerning the products, this including potential returns, requests for change of products or refunds.</p>	<p>Performance of a contract to which the Data Subject is party (art. 6, par. 1, lt. b) GDPR).</p>	<p>Petriolo will delete your personal that were processed for such purpose within 10 years from the date of the last purchase or your interaction with it.</p>

PROCESSING(S) OF DATA CARRIED OUT BY VIGNAMAGGIO OR PETRIOLO AS AUTONOMOUS DATA CONTROLLERS FOR THE PURPOSES OF MANAGEMENT OF ONLINE BOOKINGS

1 C CATEGORIES OF DATA	1.1 B PURPOSES OF THE PROCESSING	1.2 B MANDATORY OR OPTIONAL PROVISION OF DATA	1.3 B LEGAL BASIS FOR THE PROCESSING	1.4 B PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED
<ul style="list-style-type: none"> PERSONAL DATA name, surname PAYMENT DATA Credit card number or other types of payments 	<p>Management of the booking requests received via the platform for the booking of stays</p>	<p>Necessary.</p> <p>If Data is not provided, Vignamaggio and Petriolo will not be able to confirm the booking.</p>	<p>Performance of a contract to which the Data Subject is party (art. 6, par. 1, lt. b) GDPR).</p>	<p>Personal Data will be processed and stored for the period of time strictly necessary to achieve the purposes for which they were collected and in any case no later than 10 years from the date of check out by the hotel structure.</p>

Furthermore and without prejudice to the above, the Controllers undertake to base the processing of Personal Data on the principles of minimisation, by verifying on an annual basis the necessity of their storage for a period of time no longer than it is required in view of the purposes for which the data were collected and processed. The Controllers may store the Personal Data to comply with legal requirements, or to establish, exercise or defend any rights or claims in court proceedings. Once the purposes for which the Personal Data were collected and processed are achieved, the Controllers will implement adequate measures to anonymise them, so that you cannot be identified. Provided that is in any case safe the right for the Controllers to use your Data in an anonymised form.

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2 - METHODS OF DATA PROCESSING

Your Data will be processed in pursuance of the principles of fairness, lawfulness and transparency, through manual and automated methods and by deploying either paper and electronic means, in any case within the limits of the purposes of data processing(s) set forth by the present notice and, in any case, in order to ensure the safety and confidentiality of your Data.



3 - SUBJECTS AUTHORISED TO PROCESS DATA

Your Data will be processed by duly appointed employees of the Controllers', who have been expressly authorised to process the Personal Data under our instructions and taking appropriate measures to protect your Data in relation to all the purposes set forth above.



4 - POSSIBLE RECIPIENTS OF THE DATA

The personal data processed by us will not be disclosed or sold except as stated in this privacy policy.

The following subjects may become aware of your personal data in connection with the processing purposes set out in this privacy policy and will be allowed to process the Personal Data either as an autonomous data controllers or data processors duly appointed by the Controllers (the list of such data processors is available upon e-mail request to be submitted to amministrazione@vignamaggio.com):

- BTSA that operates as a data processor dealing with the management of the centralized system for customer relations which creates a single customer profile accessible to all the companies of the group to which the Joint Controllers belong in order to establish a safe, efficient and modern system for managing the relationship with customers and facilitate the cross-selling of companies' products and services. In particular, Vignamaggio and Petriolo are part of a network of farms which also includes the companies BTSA and The Newt in Somerset (jointly, the "Companies"). The user's identification and contact data are updated every time the user visits or interacts with the websites of the Joint Controllers and of the Companies. The Joint Controllers and the Companies conducted a positive balancing test in order to determine that access to the data can take place legally on the basis of their legitimate interests for the purposes indicated above. The data will not be used for direct marketing purposes by the Companies without first obtaining a specific consent to the processing. Please refer to the privacy policies of other companies for more details on their processing activities (for BTSA click [here](#) and for The Newt click [here](#));
- HubSpot, Inc. with registered seat in 25 First Street, 2nd Floor, Cambridge, MA 02141, USA, company that operates as a data processor dealing with the management service of the Petriolo and Vignamaggio customer database (see here for more details <https://legal.hubspot.com/dpa>);
- Vignamaggio Servizi srl with registered seat in Via G. Pastore 3, Greve in Chianti, Florence, VAT 07016610482, company that operates as a data processor dealing with marketing services on behalf of Petriolo and Vignamaggio (sending newsletters, market research, customer satisfaction analysis);
- Subjects who perform activities functional to the achievement of the purposes under Tables 1A, 1B and 1C above, i.e. banking service providers, fraud prevention service providers, payment services providers, carriers and shippers, companies carrying out marketing activities on behalf of the Controllers, companies providing IT infrastructure and IT support and consulting services, subjects that offer the services necessary in order to provide the online booking of stays, companies providing data analysis and development services as well as law, accounting and auditing firms;
- Subjects who can access the data under EU legislation or the Member State's to which Petriolo and Vignamaggio are subject.
- Vignamaggio and/or Petriolo purchasers or successors in the event of merger, sale, restructuring, reorganisation, winding-up or other sale or transfer of some or all of Vignamaggio or Petriolo assets in the context of which personal information are transferred.



5 - TRANSFER OF PERSONAL DATA ABROAD

The entire processing of personal data is carried out in Italy and abroad (i.e. in the United Kingdom, South Africa and the United States)

The Controllers undertake to transfer personal data to third countries:

- ensuring that the country to which your personal data will be sent guarantees an adequate level of protection, as provided under Article 45 of the GDPR; or
- complying with the standard contractual clauses approved by the European Commission as to the transfer of personal information outside the EEA (these are clauses approved under Article 46(2) of the GDPR).

For further information on rules regulating data transfers to third countries, click [here](#)



6 - YOUR RIGHTS AS DATA SUBJECT – COMPLAINT TO THE SUPERVISORY AUTHORITY

With regard to the aforementioned personal data processing, you may exercise the following rights at any time under the conditions and within the limits provided under Articles 12 and 13 of the GDPR by sending an email to amministrazione@vignamaggio.com

- Right of access (Article 15 GDPR);
- Right to rectification of inaccurate data and to have incomplete personal data completed (Article 16 GDPR);
- Right to erasure of personal data (Article 17 GDPR);
- Right to restriction of processing (Article 18 GDPR);
- Right to object to processing under Article 6(1), point (e) or (f), of the GDPR, including profiling (Article 21 GDPR);
- Right to lodge a complaint with a supervisory Authority (Article 77 GDPR).

Upon request, you will be provided with the joint controllership agreement entered into by and between Vignamaggio and Petriolo.

In case the processing is based on your consent or on the contract and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used and machine-readable format and, if technically feasible, to transmit those data to another controller without hindrance under Article 20 of the GDPR. Furthermore, you have the right not to be subject to decisions based solely on automated data processing, including profiling, which could cause legal effects concerning you as the data subject, in case you have not previously and explicitly provided consent, as set forth by art. 22 of the GDPR. Moreover, in relation to the automated processing, the data subject has the right to obtain human intervention from Vignamaggio, as well as to express an opinion or contest the decision, as provided for by art. 22, par. 2 of the GDPR.

You may withdraw your consent granted for marketing purposes at any time. You may choose to be contacted for the above purpose only through your chosen methods, and object to receiving communications by automated means.



7 - MINORS

When we refer to a 'minor' below, this means a person under 18 years of age. The customer registration to Website and the Vignamaggio/partners' products and services pertaining to the following categories: fine living, accommodations, leisure, wines, restaurants, marketed/offered/advertised through the same are in no way intended for minors. Therefore, the Controllers may not collect and/or process personal data that is known to relate to any minor. If we find out that personal data regarding minors have been supplied through the Website to Vignamaggio and/or Petriolo, we will promptly delete them.