



PRIVACY POLICY **(Articles 13 and 14, EU Regulation 679/2016 GDPR)** **- Website-**

Dear User,

EU Regulation No. 679/2016 ("GDPR") recognizes the protection of personal data processed by third parties as a fundamental right, respecting human dignity, individual freedoms, and privacy.

In compliance with the GDPR and applicable national regulations, we inform you that your personal data will be processed according to the principles of lawfulness, fairness, transparency, and confidentiality, ensuring the protection of your rights.

We provide the following policy pursuant to applicable European and national regulations.

1. Personal data processed

The following types of personal data may be processed:

- Browsing data
- Personal data (name, surname, address)
- Contact details (email, mobile number)
- Banking and payment details
- Image data (photographs, video recordings)
- Any other data voluntarily submitted
- Cookies (Please refer to the "Cookie Policy" section on our website for more information).

These will collectively be referred to as "Personal Data."

2. Purpose, Legal Basis, Nature of Processing, and Data Retention Period

Your Personal Data are processed for the following purposes:

- **Site navigation:** The computer systems and software procedures used to operate this site acquire, during their normal operation, personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes the IP addresses or domain names of the computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment. These data, necessary for the use of web services, are also processed for the purpose of: obtaining statistical information on the use of services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.); checking the proper functioning of the services offered. The legal basis for the processing is Article



6.1 lett. f) of the GDPR, i.e. the pursuit of the legitimate interest pursued of the controller. Navigation data are deleted after processing and in any case do not persist for more than seven days.

- **Managing contact requests:** your personal data will be processed to manage all requests you send us through the "Contact" section on the Site. The legal basis for the processing is Article 6(1)(b) of the GDPR, i.e. 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. The provision is necessary to fulfil the request. The data will be retained for 12 months after managing the contact request.
- **Creating an account:** Personal data will be processed to create an account within the Site. The legal basis for the processing is Article 6(1)(b) of the GDPR, 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. The provision is necessary to fulfil the request. The Data will be retained as long as the account is active. For technical reasons, the Data may be retained for up to 30 days following the deletion of the account.
- **Booking services on the Site:** Personal data will be processed to book the services available on the Site such as the restaurant and the golf course. The legal basis for such processing is Article 6(1)(b) of the GDPR, i.e. 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. The provision is necessary in order to process your request. Your data will be retained until the services for which it was collected have been completed.
- **Purchase and give away a green fee:** Personal data will be processed to purchase and give away a green fee within the Site. The legal basis for such processing is Article 6(1)(b) of the GDPR, i.e. 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. The provision of data is necessary in order to process your request. Your data will be retained for 12 months after the issue of the green fee, unless a longer period is necessary to exercise or defend a right or for legal, accounting purposes.
- **Sending commercial's communications:** i.e. for direct marketing purposes, such as sending newsletters, information and commercial communications, updates on the latest news and promotions relating to the services of the Data Controller, by newsletter, email or telephone, including by automated means (SMS, Social media). The legal basis is the consent to the processing of Personal Data (Art. 6(1)(a) GDPR). The provision of consent is optional; if Personal Data is not provided, the Data Controller will not be able to regularly update the data subject on its news and promotions. The data subject may revoke the consent given at any time by clicking on the "unsubscribe" link included in the marketing e-mail received or by writing to the following e-mail address privacy@royalparkgolf.it. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to withdrawal. Personal Data shall be retained as long as the data subject is subscribed to the newsletter service, unless the consent is withdrawn.
- **Taking photos during sporting events and competitions:** Personal Data may be processed in order to take and publish photographic and video shots, during



sporting events and competitions. The legal basis is Article 6(1)(f) of the GDPR, i.e. the legitimate interests pursued by the controller for communicating its business both internally and externally, which is balanced with the interest of participants in attending events with a large audience. The provision is optional and the data subject may object to such processing at any time by sending an e-mail to the following e-mail address: privacy@royalparkgolf.it. The data will be retained for 10 years after the conclusion of the event and/or sports competition, without prejudice to the right to object to the processing.

- **Defend a right:** it may happen that the Data Subject submits a complaint to the Data Controller or that the Data Controller receives a complaint from a third party or wants to submit it. The legal basis for such processing is, depending on the case, Article 6(1)(b) of the GDPR, i.e. the performance of contractual measures to which the data subject is a party and Article 6(1)(f) of the GDPR, i.e. the legitimate interest pursued by the controller in defending itself in or out of court. The provision is necessary to fulfil the request. The Data are retained for the duration of the claim and in any case within the statute of limitations indicated by the applicable legislation.
- **Corporate transactions:** sharing data in connection with, or during, the negotiation of extraordinary transactions of all or part of the Data Controller's business by or in another company. The legal basis is the legitimate interest pursued by the Controller (Art. 6(1)(f) GDPR). The provision of data is necessary for the legitimate interest of the controller in the negotiation and execution of corporate transactions. The data retained for this purpose will be deleted at the end of the transaction.

In addition and without prejudice to the above, the Controller undertakes to base the processing of Personal Data on the principles of minimisation, verifying on an annual basis the necessity of their storage for a period of time not exceeding that required by the purposes for which the data were collected and processed. The Controller may retain Data to comply with the law or to exercise or defend any right or claim in legal proceedings. Once the purposes for which the Personal Data has been collected and processed have been fulfilled, the Controller will implement appropriate measures to anonymise the Personal Data so that you cannot be identified.

The information in this policy does not apply to third-party sites, apps and content of any kind, even if they can be accessed from the Site by clicking on links therein.

3. Social network buttons and widgets

The social buttons are the "buttons" on the site that depict the icons of social networks (e.g. Instagram, Facebook, Youtube, LinkedIn) and that allow you to interact with a "click" directly with the social platforms. The social buttons on this site are links to the Controller's accounts on the social networks depicted. Through the use of these buttons, no third-party cookies are installed on the site.

However, we provide links where the user can view the privacy policy on data management by the social networks to which the buttons refer:

- Facebook - <https://www.facebook.com/help/cookies>
- Instagram - <https://help.instagram.com/1896641480634370>
- YouTube - <https://policies.google.com/privacy?hl=it>
- LinkedIn - <https://it.linkedin.com/legal/privacy-policy?>



4. Methods of data processing

The processing and retention of the data will be carried out using automated and computerised and/or paper-based means and tools, such as to allow you access to your personal data in our disposal, in the appropriate manner to guarantee its integrity, updating, security and confidentiality, as well as to protect it from unauthorised and/or unlawful processing as well as from loss, destruction or accidental damage.

5. Data controller

The data controller is: **ROYAL PARK GOLF I ROVERI S.S.D A R.L.**, with registered office in Fiano (TO), Rotta Cerbiatta, 24, tax code, VAT number 09239790018, Email: privacy@royalparkgolf.it (the "Data Controller")

6. Data access

Your Personal Data may be made accessible for the purposes referred to in point 2 to the Data Controller's employees and collaborators in their capacity as persons in charge and/or internal data processors and/or system administrators; to third-party companies or other entities (by way of example, credit institutions, professional firms, consultants, service companies, insurance companies, etc.) that perform outsourcing activities on behalf of the Data Controller, in their capacity as external data processors (the list of such processors and independent data controllers is available upon request by e-mail to privacy@royalparkgolf.it). These include:

- Lightspeed Netherlands B.V. company providing the platform for bookings;
- Companies providing IT infrastructure and IT support and consulting services
- banking and financial intermediaries, custodian banks;
- Italian Golf Federation
- Judicial and Public Security Authorities;
- central and peripheral bodies of the public administration, local authorities and their peripheral bodies.

7. Data Transfer

Your Personal Data are not transferred outside the EEA Area. It is in any case understood that the Data Controller, should it become necessary, will be entitled to transfer the data to the European Union and/or to non-EU countries. In this case, the Data Controller hereby ensures that the transfer of the data outside the EU will take place in compliance with the applicable legal provisions by entering, if necessary, into agreements that guarantee an adequate level of protection and/or by adopting the standard contractual clauses provided for by the European Commission and/or binding corporate rules.

8. Rights of the data subject and how to exercise them

The data subject may at any time exercise the following rights under the conditions and within the limits provided for in Articles 12-22 of the GDPR by sending an e-mail to privacy@royalparkgolf.it:

- Right of access: the data subject has the right to obtain from the data controller confirmation as to whether or not personal data concerning him or her is being processed and, if so, to obtain access to the personal data (Article 15 GDPR)



- Right to rectification of inaccurate personal data and to obtain supplementation of incomplete personal data (Article 16 GDPR);
- Right to erasure of personal data: the data subject may request that his or her data be erased if it is no longer necessary for the purposes mentioned above, in case of withdrawal of consent or his or her objection to the processing, in case of unlawful processing, or if there is a legal obligation to erase (Article 17 GDPR);
- Right to restriction of processing: the data subject has the right to obtain the restriction of processing when one of the following cases occurs: the data subject disputes the accuracy of the personal data, for the period necessary for the Data Controller to verify the accuracy of such personal data; the processing is unlawful and the data subject opposes the erasure of the personal data and instead requests that its use be restricted although the Controller no longer needs the personal data for the purposes of the processing, the personal data are necessary for the data subject to establish, exercise or defend a right in court; the data subject has objected to the processing, pending verification as to whether the Data Controller's legitimate reasons prevail over those of the data subject (Article 18 GDPR)
- Right to object to the processing: the data subject may object to the processing of his or her data at any time, unless the Data Controller demonstrates the existence of compelling legitimate grounds for processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims, pursuant to Article 6(1)(e) or (f) of the GDPR, including profiling (Article 21 GDPR);
- Right to portability: the data subject has the right to receive in a structured, commonly used and machine-readable format personal data concerning him or her provided to a data controller and has the right to transmit such data to another data controller without hindrance from the data controller to whom he or she has provided it where: the processing is based on consent, or on a contract (Article 20 GDPR);
- Right to lodge a complaint with the supervisory authority (Article 77 GDPR).

In the event that the data subject considers that the processing of personal data carried out by the Data Controller is in breach of the provisions of Regulation (EU) 2016/679, the data subject has the right to lodge a complaint with the Supervisory Authority, in particular in the Member State where he or she normally resides or works, or in the place where the alleged breach of the Regulation occurred (in Italy, the Garante per la Protezione dei Dati Personali <https://www.garanteprivacy.it/>), or to take the matter to the appropriate judicial instances.

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