P R I V A C Y

Declaration made in accordance with Art. 13 of EU Regulation 2016/679 issued by the European Parliament and Council on 27 April, 2016 concerning the protection of natural persons as regards the processing of their personal data , as well as the free circulation of such data, and which abrogates Directive 95/46/EC (General Regulations for the protection of data).

In accordance with the EU General Regulations for the protection of data (Regulation 2016/679 issued by the European Parliament and Council), please be informed that:

NAME AND CONTACT DETAILS OF THE CONTROLLER The data controller is the company:

Azienda Vinicola Castelfeder di Giovanett Günther & Co. Sas Via Franz Harpf, 15 39040 Cortina s.S.d.V. (Bz) Tel. 0471-817137 Fax. 0471-809317

> Part.lva/Cod.Fisc. IT00550510218 C.Cl.A.A: BZ Nr. 86084

> > Info@castelfeder.it

PERSONAL DATA AND SPECIAL CATEGORIES OF DATA The following are considered as being your personal data: - personal data (surname, name, address, e-mail, telephone number, fax number, date of birth) as well as your language and the license plate of your vehicle - the data shown in your passport or identity card - data relative to the method of payment or otherwise connected with your payments (e.g. bank coordinates, details of credit card) - date of arrival and length of stay

Special categories include data relative to health and specific personal needs.

MOTIVES FOR THE PROCESSING OF PERSONAL DATA AND LEGAL GROUND FOR THEIR PROCESSING The data provided will be processed for the following purposes:

- For compliance with legal obligations - For the implementation of pre-contractual and contractual requirements relative to the

guest's visit (booking, period of stay, departure etc.)

- Forwarding of communications and telephone calls directly to the guest

- Memorization of the data for the purpose of future bookings and requests

- Forwarding of information, special offers and new features offered by the company and the other associated company by e-mail, ordinary mail, and other means of communication concerning the company, the local area and any local events etc.

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Legal ground for the processing of your data:

- compliance with legal and judicial obligations

- compliance with obligations and pre-contractual and contractual requirements

- your consent

- legitimate interests: Delivery of advertisement emails (newsletter) to improvement our client service and our contacts with the clients

RECIPIENTS OF THE PERSONAL DATA

In most cases, your personal data will not be provided to third parties. In special circumstances, however, the data may:

- be forwarded to other departments within the company, subject to the limits of legitimate use;

- be forwarded to the following to third-party subjects, when necessary to meet your requests or in order to provide specific services: please see the section "third-party subjects" of this text.

The recipients listed above are required by us to comply with all current norms and standards governing the protection of data.

DURATION OF CONSERVATION OF DATA

The duration of the conservation of the data is calculated on the basis of the obligations for the conservation of the data and the requirements contemplated by the law. If your personal data are processed in order to comply with a legal requirement or a contractual obligation, they will be kept only for the time that is strictly necessary for their processing. If the data are processed with your consent, they will be kept until that consent is revoked.

RIGHTS OF THE DATA SUBJECT

Right of access by the data subject:

In accordance with art. 15 of the GDPR, you are entitled to be informed of the personal data processed, their provenance, nature, possible forwarding to third parties (in such case identifying the same) and their utilization.

Right of rectification and erasure:

In accordance with art. 16 of the GDPR, you may at any time require the rectification or completion of your personal data. Similarly, in accordance with art. 17 of the GDPR, you are entitled to require the erasure of the data. In the presence of published data, you also enjoy the "right to be forgotten", i.e. to request that the measures necessary to erase all the links, copies, replications and similar.

Right to object:

You may at any time exercise your right to object as described in art. 21 of the GDPR and modify or entirely revoke your consent for the future.

Right of restriction (or blocking) of processing:

In accordance with art. 18 of the GDPR, you may require the restriction of the processing of your personal data. The relevant data may be processed only subject to specific prior consent, i.e. their processing will be effectively limited.

Right to data portability:

In accordance with art. 20 of the GDPR, you are entitled to request and receive the personal data provided by yourself in a structured, commonly used and machine-readable format, and you have the right to require their transmission to another controller.

In accordance with art. 77 of the GDPR, you have the right to lodge a complaint with the supervisory authority.

CHARACTERISTICS OF CONSENT

Your personal data will be processed in accordance with the contract and with current legislation, as set forth in the provisions of EU Regulation 679/2016 (GDPR). Consent for the processing of personal data included in special categories is given on a voluntary basis. In the absence of such consent, the personal data cannot be processed for any future bookings.

Consent for the processing of personal data as regards the forwarding of information, special offers and new features offered by the company, too, is voluntary. If the personal data are not provided, then offers and other information shall not be supplied.

THIRD-PARTY SUBJECTS

Google Analytics (Google Inc., USA)

This website uses Google Analytics, a web analytics service provided by Google Inc. (following: Google). Google Analytics uses so-called "cookies", ie text files that are stored on your computer and that allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. However, due to the activation of IP anonymization on these websites, your IP address will be shortened beforehand by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area. Only in exceptional cases the full IP address will be sent to a Google server in the US and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activity and to provide other services related to website activity and internet usage to the website operator. The IP address provided by Google Analytics will not be merged with other Google data.

You can prevent the storage of cookies by a corresponding setting of your browser software; however, we point out that in this case you may not be able to use all functions of this website in full. In addition, you may prevent the collection by Google of the data generated by the cookie and related to your use of the website (including your IP address) as well as the processing of this data by Google by downloading the browser plug-in available under the following link and install: <u>browser add-on to deactivate Google Analytics</u>.

COOKIES

What are Cookies?

Cookies are small text files that a website places on your device when you visit certain websites.

We use cookies for this website and subdomains – whereby the user is asked to give his consent, if this is specifically required by law or other pertinent regulations – in order to facilitate the navigation of our website and to personalise the information provided. Furthermore, for safety and statistical purposes, we use relevant systems to collect user information, such as your IP address, the used browser and operating system and/or websites visited by the user for example.

If you decide to disable or refuse cookies, you may not be able to access some parts of the <u>castelfeder.it</u> website and connected subdomains, or they may not function properly.

In order to guarantee complete and faultless use of this website, you should set your browser to accept cookies. Cookies are no threat for your computer, tablet or smartphone. The cookies created by <u>castelfeder.it</u> do not contain any personal data that could be used to identify the user. All information is encrypted. The website and connected subdomains use the following types of cookies:

Navigation Cookies

These cookies are fundamental to enable you to move within the site and use its functions. Without these cookies, you might not be able to access these functions or they might not function properly.

These strictly necessary cookies are used to store a unique identifier to manage and identify each user as unique in relation to any other users who may be visiting the site at that same time. The purpose is to give the user a consistent and personalised service.

Performance Cookies

These cookies may be from Castelfeder or from one of our partners. They may be limited to one session or be permanent. Their use is limited to the performance and improvement of the website. Performance Cookies do not gather information which could identify the user. All the information gathered by these cookies is aggregated anonymously, and used only to improve the functionality of the website.

Functional Cookies

Cookies are usually triggered by an action by the user and stored on the user device. Cookies can however also be implemented, when a service is offered to a user, that he did not explicitly request. These cookies can be used to prevent repeating a service offer to a user. Furthermore, these cookies enable the website to remember the user's choices. The information gathered by these cookies is anonymous and cannot track user behaviour on other websites.

Third-party cookies for marketing/retargeting purposes These cookies are used by partners of <u>castelfeder.it</u> to show you advertisements when you are on other websites, and for example showing you the products that you have recently viewed on our website. These cookies may also be used to show products which might be of interest to you or which are similar to products you have looked at before. The use of these Cookies does not involve the processing of personal data, but may allow connection to the browser installed on your computer or other devices.

Disable cookies

Privacy laws provide users with the option of disabling cookies (opt out), which are already installed on their device. This option applies to "Technical Cookies" (art. 122 of Italian Privacy Law) and other cookies, which were previously accepted by the user (opt in). The user can disable and/or delete cookies in the browser settings (opt out).

How to disable cookies:

Internet Explorer

Steps to block the cookies of all websites:

Open the Internet Explorer by clicking the 'Start' button and clicking on Internet Explorer.

Click on the 'Tools' button and on 'Internet options'.

Click on the 'Privacy' tab, under 'Settings', move the slider to the top to block all cookies or to the bottom to allow all cookies. Click on 'OK'.

Blocking cookies might prevent some websites from displaying correctly.

Firefox Steps to block the cookies of all websites:

Click on the 'Menu' button and choose 'Settings'. Go to the 'Privacy' section. In the 'Firefox will:' section choose 'Use custom settings for history'. Uncheck the box at 'Accept Cookies from sites'. Click on 'OK'.

Google Chrome

Choose the Chrome 'Menu' item. Choose 'Settings'. At the bottom of the page choose 'Show advanced settings'. In the 'Privacy' section click the 'Content settings' button. Choose 'Block sites from saving any data'. Choose 'Done'.

The user may disable and/or delete individual non-technical third-party cookies as explained on the European Interactive Digital Advertising Alliance (EDAA): www.youronlinechoices.eu.