

## INFORMATION MADE PURSUANT TO ART. 13 AND 14 OF THE 2016/679 EU REGULATION

This document sets out the methods and purposes of the processing of personal data put in place by Madonna di Campiglio Azienda per il Turismo S.p.A., as the data controller (hereinafter, also the "Data Controller"), as well as any further information requested to in accordance with the law, including information on the rights of the data subject and their relative exercise.

The EU Regulation 2016/679 on the protection of personal data (hereinafter, the "Regulation") establishes rules relating to the protection of individuals with regard to the processing of personal data, as well as rules relating to the free circulation of such data and protects fundamental rights and freedoms of individuals, with particular reference to the right to the protection of personal data.

Art. 4, no. 1 of the Regulation provides that "Personal Data" must be understood as any information concerning an identified or identifiable natural person (hereinafter, "Data Subject").

By "Data processing", on the other hand, we mean any operation or set of operations, carried out with or without the aid of automated processes and applied to Personal Data or sets of Personal Data, such as the collection, registration, organization, structuring, storage, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of making available, comparison or interconnection, limitation, cancellation or destruction (Article 4, No. 2 of the Regulation).

Pursuant to art. 12 and ss. of the Regulations, it is also provided that the data subject must be made aware of the appropriate information relating to the processing activities that are carried out by the data controller and the rights of the data subjects.

### Data Controller

Madonna di Campiglio Azienda per il Turismo S.p.A.  
Via Pradalago 4, 38086, Madonna di Campiglio  
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WebSite [www.campigliodolomiti.it](http://www.campigliodolomiti.it)  
Cod.Fisc/Part.iva: 01854660220

### Data Protection Officer

The Data Protection Officer appointed by the Data Controller can be contacted at the following email address: [dpo@aptrentino.it](mailto:dpo@aptrentino.it)

### Purpose of the processing and legal bases

Personal data will be processed for the pursuit of the following purposes and with the legal bases indicated below:

1. the processing is aimed at establishing and maintaining contacts with press / media bodies and professionals related to it (journalists, publicists, freelancers, etc.), for sending press releases, for inviting the participation of events and initiatives organized by the Data Controller and / or in which the same is involved; the legal basis for this type of processing is represented by the legitimate interest of the Data Controller aimed at ensuring correct communication, effective management of events and an enhancement of the image of the location towards this type of data subjects, as required by art .6 par. 1 letter f) of EU Regulation 2016/679
2. the processing is aimed at establishing and maintaining contacts with influencers and bloggers, for the invitation to participate in events and initiatives organized by the Data controller and / or in which he is involved; the legal basis for this type of processing is represented by the legitimate interest of the Data Controller aimed at ensuring correct communication, effective management of events and an enhancement of the image of the location towards this type of data subjects, as required by art .6 par. 1 letter f) of EU Regulation 2016/679

### Data type

The data necessary for the pursuit of the purposes described above will be collected and processed, such as:

- identification data: name surname
- contact details: email, telephone number
- source of origin of the data (contact section of online magazine or online version of paper media, journalist's agenda, blog and social channels, directly from the data subject during events and other initiatives in which the data controller is involved)

We inform you that your data, if you have not provided them directly to the Data Controller, have been collected from public lists or third parties. In order to keep the information on the composition of the newsrooms up-to-date, the Data Controller makes use of the lists provided by "Journalist's Agenda". For collaboration with some types of professionals (e.g. influencers), the Data Controller may receive the personal data of the data subject from intermediaries.

### Nature of the provision of data and consequences in case of failure to provide them

For the processing of personal data relating to the purposes described above and related to the legitimate interest of the Data Controller, opposition to the processing of data may make it impossible to pursue the aforementioned purposes.

### Processing methods

In accordance with the provisions of art. 5 of the Regulation, the Personal Data processed are:

- (i) processed in a lawful, correct and transparent manner towards the data subject;
- (ii) collected and recorded for specific, explicit and legitimate purposes, and subsequently processed in terms compatible with those purposes;
- (iii) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

- (iv) accurate and, if necessary, updated;
- (v) processed in such a way as to guarantee an adequate level of security;
- (vi) kept in a form that allows the identification of the data subject for a period of time not exceeding the achievement of the purposes for which they are processed.

The data processing will be carried out both with manual and / or IT and telematic tools with organizational and processing logics strictly related to the purposes themselves and in any case in such a way as to guarantee the security, integrity and confidentiality of the data in compliance with the organizational and physical measures, and logic provided for by the provisions in force.

#### **Subjects involved in the processing and communication of data**

The recipients of the data subject's personal data may include the authorized subjects belonging to the organization of the Data Controller, appropriately trained and made aware of the constraints imposed by EU Regulation 2016/679.

Furthermore, without prejudice to the communications required by law or the exercise of the right of defense, the personal data subject to processing may be communicated to external data processors appointed by the Data Controller (the complete list of external managers is available from the Data Controller), to the management of the aforementioned purposes. The updated list of designated Data Processors can be provided at the request of the data subject. As part of the pursuit of the aforementioned purposes, the data may be disclosed to other subjects acting as independent data controllers.

#### **Data dissemination**

The data will not be disseminated, unless this is necessary for the fulfillment of legal obligations, in which case the data could be disclosed to public bodies, or to public authorities.

#### **Data transfer abroad**

For the purposes indicated above, personal data will be processed within the European Economic Area (EEA). Should they be transferred to Third Countries, in the absence of an adequacy decision by the European Commission, the provisions of the applicable legislation on the transfer of Personal Data to third countries will be respected, such as the Standard Contractual Clauses provided by the European Commission.

#### **Data retention**

In general, the Personal Data will be kept for the time strictly necessary to pursue the purposes for which they were collected and processed, or until the data subject expressly requests for cancellation of the same, unless the Data Controller needs to defend its own right in court.

#### **Rights of the data subject**

The data subject may exercise, in relation to the data processing described therein, the rights provided for by the applicable legislation on the protection of personal data (Articles 15-22 of EU Regulation 2016/679), including the right to:

- Right of access (Article 15): or confirms whether or not personal data concerning you are being processed and in this case, the right to obtain, among other things, access to your personal data and information concerning the purposes of the processing, the categories of personal data in question, the recipients or categories of recipients to whom the personal data have been or will be communicated.
- Right of rectification (Article 16): rectification of inaccurate personal data concerning you without undue delay and (ii) integration of your personal data, if incomplete.
- Right to cancellation ("right to be forgotten") (Article 17): cancellation of personal data concerning you without undue delay (the Data Controller is obliged to cancel personal data without undue delay in the cases provided for by article 17 of the Regulation).
- Right to limitation of processing (Article 18): limitation of processing in the cases referred to in Article 18 of the Regulation.
- Right to object to processing carried out pursuant to Article 6, paragraph 1 letters e) or f) (Article 21): opposition, at any time, for reasons connected with your particular situation, to the processing of personal data concerning you at pursuant to article 6, paragraph 1 letters e) or f) including profiling on the basis of these provisions.
- Right to lodge a complaint (Article 77): In the event that the data subject believes that the processing of their personal data violates the provisions of EU Regulation 2016/679, they have the right to lodge a complaint with the Guarantor for the Protection of Personal Data with based in Rome, pursuant to art. 77 of EU Regulation 2016/679 itself, as well as appealing to the judicial authority.
- The exercise of rights may take place by sending a request that must be addressed without any formalities to the Data Controller at the addresses indicated above. Before providing an answer, the Data Controller may need to identify the data subject. Written feedback will be provided without undue delay and, in any case, no later than one month from receipt of the request.

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