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## PRIVACY POLICY

Protecting and defending your privacy is important to Esanastri S.r.l.. This statement regarding the privacy policy and the protection of your personal data (called Privacy Policy or Privacy Statement) will enable you to learn how Esanastri S.r.l. uses and manages the information you provide, your personal data and any sensitive data which will be collected by the site <http://www.esanastri.com> in order to be able to offer the services you require.

This statement will also explain your options and rights regarding the data provided, without which Esanastri S.r.l. may be unable, in part or entirely, to offer you its services.

This statement also draws on Recommendation no. 2/2001 which the European Authorities for the protection of personal data, in the Working Group established by Article 29 of Directive no. 95/46/CE, adopted on 17 May 2001 to determine some minimum requirements regarding the collection of personal data online, and, in particular, the methods, timeframes and nature of the information that data controllers must provide to users when they connect to websites, regardless of their reasons for connecting.

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# STATEMENT REGARDING THE PROCESSING OF PERSONAL DATA AS PER ARTICLE 13 OF ITALIAN LEGISLATIVE DECREE 196/2003 AS AMENDED

We wish to inform you that Italian Legislative Decree no. 196 of 30 June 2003 ("Regulations on the protection of personal data" or "Privacy Code") provides for and ensures the right to the protection of personal data that are subject to processing by third parties by virtue of the principle that everyone has the right to the protection of their personal data and to have that data processed in compliance with fundamental rights and freedoms, with respect for the dignity of the interested party, in particular with regards to confidentiality and personal identity.

For the purposes of this statement and in accordance with the privacy code, the following are defined as:

- a. "processing", any operation or group of operations, performed with or without the aid of electronic instruments, regarding the collection, recording, organisation, storage, referencing, processing, modification, selection, extraction, comparison, use, association, blocking, transmission, circulation, deletion and destruction of data, whether or not they are recorded in a database;
- b. "personal data", any information regarding an individual who has been or may be identified, directly or indirectly, through a reference to any other information, included therein a personal identification number;
- c. "identifying data", personal data that enable the interested party to be directly identified;
- d. "sensitive data", personal data capable of revealing one's racial and ethnic origin; religious, philosophical or other such beliefs; political opinions; connection to political parties, unions, associations or organisations of a religious, philosophical, political or union-related nature; as well as personal data capable of revealing one's health conditions or sexual activity;
- e. "controller", the individual, legal entity, public administration or any other entity, association or organisation responsible for decisions, whether alone or with another controller, regarding the aims and methods for processing the personal data and the instruments used, included therein the security profile;
- f. "data processor", the individual, legal entity, public administrator or any other entity, association or organisation appointed by the controller to process the personal data;
- g. "persons in charge of processing", the individuals authorized by the controller or data manager to process data;
- h. "interested party", the individual to whom the personal data refer;
- i. "communication", making the personal data known to one or more parties determined to be different from the interested party, the controller's representative on State territory, the data processor and the persons in charge of processing, in any form, including making them available or referencing them;
- j. "circulation", making the personal data known to unspecified parties, in any form, including making them available or referencing them;
- k. "anonymous data", data which originally, or after processing, cannot be associated with an interested party that has been or may be identified;
- l. "blocking", storing personal data while temporarily suspending any further processing;
- m. "database", any organized grouping of personal data, divided into one or more units in one or more locations;
- n. "Authority", the privacy authority as per Article 153, established by Italian Law no. 675 of 31

December 1996;

- o. "minimum requirements", the whole of the technical, computerized, organisational, logistical and procedural security measures that set the minimum level of protection required in regards to the risks provided for by Article 31 of the Italian Privacy Code;

In compliance with the aforementioned regulations and principles, the processing that we will perform on the data you provide us will be characterized by principles of lawfulness, fairness and transparency, and will be carried out with due regard for the principle of need in data processing: our systems and computer programmes will be set up so that the use of personal and identifying data is reduced to a minimum, so as to prevent processing when the pursued goals, in each individual case, can be achieved using anonymous data and appropriate methods that enable you to be identified only when necessary, respectively.

## **INFORMATION COLLECTED BY THE SITE HTTP://WWW.ESANASTRI.COM AND THEREFORE BY ESANASTRI S.R.L.**

While using the site <http://www.esanastri.com> you will be given the chance to contact Esanastri S.r.l. electronically and non-electronically.

Regarding the information that may be requested of you or that will be voluntarily provided, we wish to inform you that the provision of data may be optional in some cases and in others, however, required; and in such cases, any refusal to provide such data could prevent the operation from being carried out in part or entirely.

The data processing may also regard personal data that in some countries fall under the category of "sensitive data" as defined above; consequently, Esanastri S.r.l. will adopt all the due caution and measures required by the privacy code.

Below you will find a list of examples of the data which may be collected and processed, for reasons including improvement of the services requested: Information you have provided when requesting information, such as, for example, your name, surname, email address, certified email address, telephone number, postal address, mobile phone number, the address of your workplace, your date and place of birth, and information on your credit card. As further examples, you could also be asked to indicate an arrival/departure date, a place, a number of people, the architectural features or use of a property, the technical specifications of a product, etc...

During your contact with Esanastri S.r.l., you could be asked to provide us with information needed to continue our interaction using "free-form" fields (for sending forms, emails and other kinds of communication). In this specific case, you will be free to send us further information which will likewise be processed in accordance with the regulations in force regarding the protection of your privacy.

Should you register for restricted access areas, you could be asked for other information, in addition to that cited above, such as a username and password. We could also gather further information from the way you use our website, from the content and services that you request, as well as the operations that you carry out. Some information could also derive from your comments and from content you acquire while visiting our website.

It is important to note that, in certain cases, should you fail to provide the information we request, we will be unable to offer some or all of our services.

## **THE AIMS AND PURPOSES FOR USING THE INFORMATION AND PERSONAL DATA THAT WE COLLECT**

Providing our services, content and information regarding Esanastri S.r.l.'s activities and products; improving and customizing our website, or other sites owned by Esanastri S.r.l., with the aim of constantly improving our service; conducting research on our site in terms of our services and products; ensuring that the services, products and content of our site are of interest to you; delivering and providing our content, services and personalized replies to your requests for information; asking for more detail in regards to your requests for information so as to be able to personalize our replies further; checking on and ensuring security, conducting research and analyses so as to protect, preserve, and when possible improve the content, services and products we offer; transferring your data to pertinent third parties, possibly to public entities, to the relevant authorities who expressly request them, to trade associations, data collection agencies, administrative authorities and recipients as is reasonably required to conduct our business and in the event of acquisition, mergers, discontinuance of a business branch, a change in company structure, etc...

Newsletter and Notices: in order to keep you updated on our services, products, possible changes in hours or address and to inform you about our content, services, offers, promotions, events, etc. we may send you an email, our newsletter or other forms of communication via email, telephone, text/video message, post, or other similar communication channels, subject to your freely given, express and informed consent.

## **HOW ESANASTRI S.R.L. STORES YOUR PERSONAL DATA AND WHEN IT TRANSFERS THEM**

All the data you provide during or through using the website <http://www.esanastri.com> will be processed, subject to your express consent regarding the entire processing or one or more processing operations, by the data controller, the data processors (if designated by the data controller) and/or the persons placed in charge by the data controller and/or by the data processors.

Your sensitive data, should they be provided, may be subject to processing only with your written consent, in compliance with the conditions and limits set by the privacy code as well as by laws and regulations.

The data controller is Esanastri S.r.l., with offices in Via A.Barducci 18/a, 56012 Calcinaia (PI).

All the operations to be carried out on the data you provide will be conducted with the utmost care and will be adjusted to protect your confidentiality. The aims of the processing operations will be to collect, record, organise, store, reference, process, modify, select, extract, compare, use, associate, block, communicate, delete and destroy the data, as well as any combination of two or more of the aforementioned activities.

The data you provide us will be processed manually and/or automatically, on paper and/or digitally (with the aid of electronic instruments that we own and/or are provided by third parties). They will be kept using appropriate technical, computerized, organisational, logistical and procedural security measures that meet or exceed the minimum level of protection required in regards to the risks as per Article 31 of the Italian Privacy Code, and in all cases comply with any other regulation or provision applicable under the circumstances, for the sole purpose of reducing the risk of destroying or losing the data, even when accidental, the risk of unauthorized access, non-permitted processing or any other processing inconsistent with its aims.

We will only process those data that are strictly pertinent and complete and that do not exceed the aims connected to the services for which they have been collected or subsequently processed, and we will only store them in a form that enables you to be identified for a period of time no longer than necessary for the purposes for which they were collected or subsequently processed.

Over time, the security measures put into place by Esanastri S.r.l. may occasionally be adjusted in light of applicable regulations at that moment and the technical evolution of the industry and/or of technologies for storing and filing data.

The manager and/or data processor and the persons placed in charge, appointed by Esanastri S.r.l., will be suitably trained, with special attention given to regulations and the adoption of minimum security measures, for the sole purpose of ensuring the data remains confidential and secure. Under no circumstances will the personal data be divulged to third parties without your prior consent.

The personal information you provide through the website <http://www.esanastri.com> are sent to and could be stored on servers located both within and beyond the European Union.

We may communicate any personal information you provide through using the website

<http://www.esanastri.com> to other companies belonging to the Esanastri S.r.l. Group and/or to third parties which will be cited in the particular cases described below.

## **POSSIBLE COMMUNICATION OF YOUR DATA TO THIRD PARTIES**

All the data processing operations described in this privacy statement may require the information collected by Esanastri S.r.l. to be shared with our affiliate companies located in and beyond Italy, and with our partners, our suppliers (for example, banks, couriers, logistics companies), consultants, marketing companies, possible joint ventures and any future owner of the site or of our business.

We may release your personal data to other companies in connection with any kind of possible or actual reorganisation, merger, sale, transfer or other provisions regarding our business or part of it, its assets and its shares/stock.

We may also use the services of other companies or individuals to act and work on our behalf, such as, for example, providing services, sending correspondence, providing marketing assistance, analysing data, providing customer support services, or for accounting, financial, sales, administrative/invoicing, legal or fiscal purposes, etc.

In order to be able to carry out the activities delegated to them, the aforementioned individuals or companies will be able to process your personal information as data processors appointed by us or as independent data controllers. We will only reveal to these companies or individuals such personal information as is strictly necessary for them to carry out their specific duties.

When specifically requested, we will be able to collaborate with any court, administrative authority, police authority, or other similar authority in any investigation or procedure that may concern you or is pertinent to your use of the website <http://www.esanastri.com>.

This collaboration may involve communicating personal information that concerns you to the authorities by their express request.

Although our company adopts suitable measures for protecting the personal information or any sensitive data that you have provided or will provide us while using the website <http://www.esanastri.com>, by definition no transmission via Internet can ever be guaranteed as absolutely secure.

Therefore, please bear in mind that it is not possible to ensure - and therefore we cannot ensure - the absolute security of any personal information you transmit to us via Internet when using the website <http://www.esanastri.com> or when using email services.



## **PLUGINS AND WIDGETS**

The website <http://www.esanastri.com> owned by Esanastri S.r.l. may use third-party Plugins.

When you visit a page on our site containing one or more of these elements, your browser will display content (text and/or images) sent and/or chosen by the owner of the Plugin. These plugins can also install cookies (third-party cookies).

As a result, our site is not responsible for such content, and we therefore refer you to the privacy statement of the Plugin owner.

The social plugins that our site could use may include, but are not limited to, those from the following social networks: [facebook.com](https://www.facebook.com) ("Facebook"), [plus.google.com](https://plus.google.com) ("Google+"), the micro-blogging service [twitter.com](https://twitter.com) ("Twitter"), etc.

In the future, Plugins from other sites and/or social networks could be included on the pages of our website.

## **COOKIES**

The Internet site owned by Esanastri S.r.l. uses cookies (and/or similar technologies), that is, small strings of text that the sites visited by the user send to his/her terminal (usually to the browser), where they are stored to memory so as to be later sent back to the same sites the next time that terminal visits them. The site only uses technical cookies such as Session and Analytics cookies. These cookies do not allow the acquisition of personal identification data.

## **TRACKING SOFTWARE AND STATISTICS**

To help us analyse the way you use our Internet site, we may use our own or third-party tracking software.

The tracking software tools that we may employ could make use of cookies which enable certain information and data to be collected about you and your visits to the site, such as, for example, the time and length of your visit, the pages visited, the place from which you visited the Internet site, your IP address, the kind of browser you're using, your screen resolution, the number of pages visited, the path your visit took, and other information deriving from the clickstream and its relative analysis.

By using this information, we may be able to customize our services for you and make using the website <http://www.esanastri.com> easier and more efficient.

Nearly all browsers allow users to delete cookies and tracking software from their device or to deactivate cookies or tracking software entirely. If you'd like to know how to perform this operation, see your browser's instructions or help function.

In all cases, please bear in mind that the refusal of cookies or tracking software could lead to a reduction in the level of site functions or prevent them from working entirely.

## **YOUR RIGHTS PURSUANT TO ARTICLE 7 OF ITALIAN LEGISLATIVE DECREE NO. 196/2003**

Please contact us if you have any questions or comments, or to request an explanation regarding Esanastri S.r.l.'s privacy policy as well as this statement; if you wish to exercise your rights regarding the protection of your privacy or other rights in connection with your personal data; or if you have any other questions or requests.

While we will do our best to meet your needs, we cannot always delete information regarding interactions that have taken place and any past transactions and/or bookings.

It is important that you be properly informed regarding your rights as follows, provided for by Article 7 of Italian Legislative Decree no. 196/2003:

- a. The right to obtain confirmation of the existence - or lack - of personal data concerning you and the communication of such data in an intelligible form;
- b. The right to obtain information and to be informed regarding the origin of the personal data; the methods and purposes of the data processing; the logic applied in the event the data is processed with the aid of electronic instruments; the details identifying the data controller, the data processors, and the persons or groups of persons to whom your personal data may be communicated or who can have access to them as processors or persons in charge of processing
- c. The right to update, correct or, when you so choose, to add to the data; the right to the deletion, conversion to an anonymous form or blocking of data processed illegally, including data that do not need to be stored in terms of the purposes for which the data were collected or subsequently processed; the right to a statement that the above operations have been brought to the attention of those to whom the data have been communicated or circulated, including as regards the content of the data, except in the event that compliance with the above proves impossible or requires the use of means that are clearly excessive with regards to the protected right;
- d. The right to object, entirely or in part, to the processing of personal data that concern you for legitimate reasons, even if they pertain to the aim of collecting and processing the personal data that concern you for the purposes of sending advertising or direct sales materials, for conducting market research or for business communications.

When you visit any area dedicated to you, which is accessible once you have logged into your account, you also have the right/responsibility to update any of your personal data we retain that is out of date or incorrect at any time.

Please contact us if you'd like to have a copy of your personal data, inform us of any inaccuracy or errors in the information we retain, exercise your rights, or if you have any questions regarding our statement on the protection of personal data and privacy.

You can also send requests to the data controller or data processor via registered post, fax or email, or any other system the Privacy Authority should adopt with regards to new technological solutions. In all cases, you may also exercise your rights as per Article 7, paragraphs 1 and 2 of the privacy code by making a merely verbal request, and in such a case a written summary will be recorded by the interested party or by the processor.

## **THIRD-PARTY SITES AND HYPERTEXT LINKS**

Our site, <http://www.esanastri.com>, may contain hypertext links and/or advertisements for other sites which are not owned or controlled by Esanastri S.r.l..

Please bear in mind that this privacy statement applies exclusively to the personal information that we collect via our site and we cannot be held responsible in any way for personal information collected, stored and used by third parties through our sites.

Esanastri S.r.l. recommends reading the privacy statement for each site you visit.

## **MINORS**

When you communicate your personal data to us, we assume and you ensure us that you are not under the age of 18. Esanastri S.r.l. does not intend to collect any personal information on individuals below the age of 18. When necessary, we will specifically instruct underage users not to communicate their data through our sites and/or we will take reasonable measures to ensure that parents/guardians have control over the communication of such data.

Parents/guardians should be aware that our privacy statement and policy will regulate the use of personal data, but the information given voluntarily by minors - or by others - in comments or similar functions may be used by third parties to generate unrequested correspondence.

We suggest that all parents/guardians teach their children to use their personal data in a safe, responsible manner while using the Internet, monitoring them when necessary to the extent and using the methods that they deem appropriate.

## **CHANGES TO OUR PRIVACY STATEMENT**

Considering that the current state of automatic control mechanisms cannot rule out errors and malfunctions, we reserve the right to make any changes we deem necessary, or changes that are made mandatory by law or other regulatory bodies, to this privacy statement without prior notification. We strongly advise checking this privacy statement consistently and periodically, as it will be assumed that you have accepted changes and updates if you continue to use the website once they have been published.