

# CABRIO RENT - PRIVACY POLICY

Cabrio Rent, with registered office in Località San Marziale, 27 - 53034 Colle Val D'Elsa (Siena), Italy P.IVA e C.F. 01182800522 (hereinafter "Holder"), as data controller, informs you pursuant to art. 13 D.Lgs. 30.6.2003 n. 196 (hereinafter, "Privacy Code") and art. 13 EU Regulation n. 2016/679 (hereinafter, "GDPR") that your data will be processed in the manner and for the following purposes:

## 1. OBJECT OF THE TREATMENT

The Data Controller processes personal data, (such as name, surname, company name, address, telephone number, e-mail address, bank and payment details, hereinafter, "personal data" or even "data") that you have communicated on the conclusion of contracts for the services of the Owner.

## 2. PURPOSES OF THE TREATMENT

Your personal data are processed: Without your express consent (Article 24 letter a), b), c) Privacy Code and art. 6 lett. b), e) GDPR), for the following Service Purposes:

- conclude the contracts for the services of the Owner;
- fulfil the pre-contractual, contractual and tax obligations deriving from relations with you in existence;
- fulfil the obligations established by law, by a regulation, by community legislation or by an order of the Authority;
- exercise the rights of the Owner;

The Owner provides a service platform to its Partners whose purpose is the interaction of visitors with the manager and / or owner of a place and / or commercial activity.

A non-exhaustive list by way of example is the following:

- Booking services
- Compilation of contact forms
- Entry of comments and reviews

The Data Controller acts as a link between the visitor and a third party, designated by a Partner to receive data sent by visitors through the completed forms.

The Owner can keep the data sent by visitors to the exclusive purpose of guaranteeing the service requested by the visitor; these data will not be used for commercial, marketing or profiling purposes by the Owner.

The data could be stored in cloud platforms and external storage systems, always protected by security procedures in order to ensure continuity with the directives of the GDPR.


However, the Owner can not guarantee the correct use of data, by third parties, sent for the provision of a service to the visitor.

The visitor who wants to use one of the services offered will be informed of further ways and purposes of the processing of data by a third party just before sending the data.

These modalities will be defined by the Partners during the creation of the service, through the means provided by the platform. The visitor fully accepts all the purposes listed to use the services.

The visitor who uses these services is aware that the data will be sent to third parties. In the absence of any modalities related to the use of data by third parties for the provision of the service, the visitor has the right to ask the Owner for the destination and methods for sending the data. The Owner is exempt from any responsibility regarding incorrect use of data by third parties.

Only subject to your specific and distinct consent (articles 23 and 130 of the Privacy Code and article 7 of the GDPR), for the following Marketing Purposes:

- send you via e-mail, mail and / or sms and / or telephone contacts, newsletters, commercial communications and / or advertising material on products or services offered by the Owner and recognition of the degree of satisfaction on the quality of services;
- send you via e-mail, mail and / or sms and / or telephone contacts commercial and / or promotional communications processed by the owner's team.  Please note that if you are already a customer, we may send you commercial communications relating to services and products of the Owner similar to those you have already used, subject to your disagreement (Article 130 paragraph 4 of the Privacy Code).

### 3. PROCESSING METHODS

The processing of your personal data is carried out by means of the operations indicated in art. 4 of the Privacy Code and art. 4 n. 2) GDPR and more precisely: collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation, and destruction of data. Your personal data are subjected to both paper and electronic and / or automated processing.

The Data Controller will process the personal data for the time necessary to fulfill the aforementioned purposes and in any case for no more than 10 years from the termination of the Service Finality relationship and no later than 2 years from the collection of data for the Marketing Purposes.

### 4. ACCESS TO DATA

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B): to employees of the Controller or collaborators for the verification of infrastructure security, in their capacity as persons in charge and / or internal managers of the processing and / or system administrators

### 5. COMMUNICATION OF DATA

Without the need for express consent (pursuant to Article 24 letter a), b), d) Privacy Code and art. 6 lett. b) and c) GDPR), the Data Controller may communicate your data for the purposes referred to in art. 2.A) to Supervisory Bodies, Judicial Authorities, to insurance companies for the provision of insurance services, as well as to those subjects to whom the communication is mandatory by law for the accomplishment of said purposes. These subjects will process the data in their capacity as independent data controllers.

Your information will not be disseminated.

### 6. DATA TRANSFER

Personal data is stored on servers within the European Union. In any case, it is understood that the Data Controller, if necessary, will have the right to move the servers even outside the EU. In this case, the Data Controller hereby ensures that the transfer of non-EU data will take place in accordance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided by the European Commission.

### 7. NATURE OF THE PROVISION OF DATA AND CONSEQUENCES OF REFUSAL TO REPLY

The provision of data for the purposes referred to in art. 2.A) is mandatory. In their absence, we can not guarantee the Services.

The provision of data for the purposes referred to in art. 2.B) is optional. You can therefore decide not to give any data or to subsequently deny the possibility of processing data already provided: in this case, you will not be able to receive newsletters, commercial communications and advertising material concerning the Services offered by the Data Controller. However, you will continue to be entitled to the Services referred to in art. 2.A).

## 8. RIGHTS OF THE INTERESTED PARTY

In your capacity as an interested party, you have the rights set forth in art. 7 of the Privacy Code and art. 15 GDPR and precisely the rights of:- obtain confirmation of the existence or not of personal data concerning you, even if not yet registered, and their communication in an intelligible form;

- obtain the indication: a) of the origin of personal data; b) of the purposes and methods of the processing; c) of the logic applied in case of treatment carried out with the aid of electronic instruments; d) of the identification details of the owner, the managers and the designated representative pursuant to art. 5, paragraph 2 of the Privacy Code and art. 3, paragraph 1, GDPR; e) the subjects or categories of subjects to whom the personal data may be communicated or who may become aware of it in their capacity as designated representative in the territory of the State, managers or agents;
- obtain: a) updating, rectification or, when interested, integration of data; b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed; c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right;
- object, in whole or in part: a) for legitimate reasons to the processing of personal data concerning you, even if pertinent to the purpose of collection; b) to the processing of personal data concerning you for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication, through the use of automated call systems without the intervention of an operator by e-mail and / or through traditional marketing methods by telephone and / or paper mail. It should be noted that the right of opposition of the interested party, set out in point b) above, for direct marketing purposes through automated methods extends to traditional ones and that in any case the possibility remains for the data subject to exercise the right to object even only partially. Therefore, the interested party can decide to receive only communications using traditional methods or only automated communications or none of the two types of communication.

Where applicable, it also has the rights referred to in Articles 16-21 GDPR (Right of rectification, right to be forgotten, right of limitation of treatment, right to data portability, right of opposition), as well as the right of complaint to the Guarantor Authority.

## 9. HOW TO EXERCISE RIGHTS

You can exercise your rights at any time by sending:

- a registered letter a.r. at Cabrio Rent, with registered office in Località San Marziale, 27 - 53034 Colle Val D'Elsa (Siena), Italy
- an e-mail to [info@cabriorent.it](mailto:info@cabriorent.it)

## 10. HOLDER, MANAGER AND AGENTS

The Data Controller is Cabrio Rent, with registered office in Località San Marziale, 27 - 53034 Colle Val D'Elsa (Siena), Italy

The updated list of data processors and data processors is kept at the registered office of the Data Controller.

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# COOKIE

## What are cookies

A "cookie" is a small text file created on the user's computer when he accesses a particular site, with the purpose of storing and transporting information. Cookies are sent by a web server (which is the computer on which the visited website is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and stored on the computer of the latter; they are then sent back to the website at the time of subsequent visits.

During navigation, the user may receive cookies from different sites on his terminal (so-called "third-party" cookies), set directly by the operators of said websites and used for the purposes and according to the procedures defined by them.

The site uses:

- session cookies the use of which is not instrumental to the collection of personal data identifying the User, being limited to the transmission of session identification data in the form of numbers generated automatically by the server. Session cookies are not stored permanently on the User's device and are automatically deleted when the browser is closed.
- third-party cookies for sharing on some of the main social networks (examples are Facebook, Twitter, Google+, WhatsApp, YouTube, LinkedIn ...).

Each time the user decides to interact with the plug-ins or accesses to the Site after having "logged in" through your Facebook or Twitter account, some personal information may be acquired by the managers of social network platforms (for example, the User's visit to the Website).

## Rights of the interested party

The interested party can assert at any time, by sending an email to the address [info@cabriorent.it](mailto:info@cabriorent.it) the rights set forth in art. 7 of Legislative Decree 30 June 2003 no. 196, which is reported below.

### Art. 7 D. Lgs. 196/2003

1. The interested party has the right to obtain confirmation of the existence or not of personal data concerning him / her, even if not yet registered, and their communication in intelligible form.

2. The interested party has the right to obtain the indication:

- a) of the origin of personal data;
- b) of the purposes and methods of the processing;
- c) of the logic applied in case of treatment carried out with the aid of electronic instruments;
- d) of the identifying details of the holder, of the responsible and of the designated representative according to article 5, paragraph 2;
- e) of the subjects or categories of subjects to whom the personal data may be communicated or who can learn about them as appointed representative in the territory of the State, managers or agents.

3. The interested party has the right to obtain:

- a) updating, rectification or, when interested, integration of data;

- b) the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- c) the attestation that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disseminated, except in the case where such fulfillment is it proves impossible or involves a use of means manifestly disproportionate to the protected right.

4. The interested party has the right to object, in whole or in part:

- a) on legitimate grounds, to the processing of personal data concerning him / her, even though they are relevant to the purpose of the collection;
- b) to the processing of personal data concerning him for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.

## THIRD-PARTY COOKIES

The data controller does not have access to data that is collected and processed independently by the managers of social network platforms. For more information on the logic and methods of processing data collected from social networks, users are invited to read the privacy information provided by the parties providing the services in question.

### Main Social Networks

- Facebook <http://www.facebook.com/policy.php>
- Twitter <http://twitter.com/privacy>
- WhatsApp <https://www.whatsapp.com/legal/>
- Google+ e YouTube <https://www.google.it/intl/it/policies/privacy/>

### Google Analytics

The Site uses Google Analytics. It is a web analysis service provided by Google Inc. ("Google") that uses cookies that are stored on the user's computer to allow statistical analysis in aggregate form in order to use the website visited.

The data generated by Google Analytics are stored by Google as indicated in the Information available at the following link: <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

To consult the privacy policy of the company Google Inc., owner of the independent processing of data relating to the Google Analytics service, please refer to the website <http://www.google.com/intl/en/analytics/privacyoverview.html>

## DATA MANAGEMENT FROM THE BROWSER

### Provision of data

Except for technical cookies strictly necessary for normal navigation, the provision of data is left to the will of the person who decides to browse the site after having read the brief information contained in the appropriate banner and / or to use the services that require the installation of cookies. The interested party can avoid the installation of cookies through the appropriate functions available on their browser.

### Disabling cookies

Without prejudice to the foregoing in relation to cookies strictly necessary for navigation, the user may delete the other cookies through the functionality provided by the website through this information or directly through their browser. Each browser has different procedures for managing settings. The user can obtain specific instructions through the links below or through the help of his specific navigation program.

- Microsoft Windows Explorer: <https://privacy.microsoft.com/it-it/windows-10-microsoft-edge-and-privacy>
- Google Chrome: [https://support.google.com/chrome/answer/95647?hl=it&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies)
- Mozilla Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie?redirectlocale=en-US&redirectslug=Enabling+and+disabling+cookies>
- Apple Safari: [https://support.apple.com/kb/PH17191?viewlocale=it\\_IT&locale=it\\_IT](https://support.apple.com/kb/PH17191?viewlocale=it_IT&locale=it_IT)

Taking note of the above information and present on the site <https://www.cabriorent.it/> authorize the processing of my sensitive data in accordance with this information.