

General information for guests and suppliers

According to Article 13 of the European Regulation 2016/679

Dear customer, we would like to inform you that the processing of personal data provided by you, including accurate, is carried out for legitimate purposes and in compliance with your privacy and rights. In accordance with the above regulation, we provide you with the following information.

	1. Data controller: Villaggio Turistico Internazionale Srl, via delle Colonie 2 - 30028 Bibione di San Michele al Tagliamento (VE) - +39 0431 442611 – info@vti.it
	2. the person in charge of data security can be contacted at the following address dpo@vti.it

ID	3. Purpose of processing 	Legal basis for processing (Ref. RE 2016/679) 
a)	Offers and bookings of accommodation services, additional, specific services required and restaurant services	the processing is necessary for the performance of a contract to which the data subject is a part or for the performance of pre-contractual measures taken at the request of the data subject (Art. 6 paragraph 1 letter b))
b)	Special data processing Art. 9 for the management of emergency escape procedures for guests with disabilities.	the operation is necessary for legal obligation in order to protect a vital interest of the data subject (Article 9(2)(c) and (g)).
c)	Special data processing Art. 9 for the management of food intolerances of the guests.	Agreement
d)	to inform the police headquarters about the personal data of the accommodated clients for reasons of public safety	the operation is necessary for compliance with a legal obligation (Art. 6(1)(c))
e)	Control of accesses equipped with electronic locks in case of suspected criminal acts (e.g. theft, robbery, damage, vandalism).	the processing is necessary for the performance of a contract to which the data subject is part or for the implementation of pre-contractual measures taken at the data subject's request (Article 6(1)(b)).
f)	Fulfill ongoing administrative, accounting and tax obligations for customers and suppliers.	the processing is necessary for the performance of a contract to which the data subject is party and in order to comply with a legal obligation (Art. 6(1)(b) and (c)).
g)	Communicate promotional initiatives, simplify and expedite registration procedures for follow-up stays, survey customer satisfaction.	the processing is necessary for the pursuit of the legitimate interest of the controller, namely to provide offers to your customers, to encourage them to enroll in the facility, to facilitate the enrollment procedures and to monitor and improve the quality of the service (Art. 6(1)(f))
h)	Repayment of loans	the processing is necessary for the pursuit of the controller's legitimate interest in protecting its credit (Article 6(1)(f))
i)	Fraud prevention, including Cyber fraud	the processing is necessary for the pursuit of the legitimate interest of the controller, which is the protection against fraudulent transactions carried out also by third parties (Art. 6(1)(f))
j)	Management of access and traffic of vehicles of guests and suppliers in the areas concerned (license plates).	The processing of data contained in logs is necessary to pursue the legitimate interest of the data controller, which is to protect against fraudulent activities, including those carried out by third parties (Article 6(1)(f)).
l)	Video surveillance images' processing, in order to protect people, the owner's property,	Owner's legitimate interest (Art. 6(1)(f))

	company assets and areas open to the public, involving also the presence of money or valuable assets, against possible assault, theft, robbery, damage or vandalism	
m)	Sending newsletters to present offers, promotions and business opportunities from the Controller.	Agreement

4. Processing method.

The data will be processed in written form and/or on magnetic, electronic or telematic supports. The communication of the data is optional, but the failure to provide the data may result in the impossibility to fulfill contractual obligations and/or requests from interested parties.

Areas subject to video surveillance are identified by appropriate signs.

The viewing of live images is permitted to only authorised company employees from 11.00 p.m. to 7.00 a.m



5. **Obligation or faculty to provide data and consequences of a possible refusal.**

The provision of personal data is optional, but the refusal to provide it will make the impossibility to provide the services requested. The processing of video surveillance images is necessary to access the facilities of Villaggio Turistico Internazionale Srl.



6. **Transmission of data.**

Your personal data may be transferred, for the purposes described in this Policy, within the territory of the European Union. In the event that your Data is transferred outside the European Union, the Controller assesses the impact of the data transfers and adopts, if applicable, the most appropriate safeguards (e.g. adequacy decisions or standard contractual clauses or Binding Corporate Rules). Video surveillance images will be processed in the territory of the European Union.



7. **Recipients of the personal data.**

- Without prejudice to the communications and disclosures made in fulfillment of legal obligations, also for the purposes of credit protection and better management of our rights in relation to the individual business relationship, exclusively for purposes related to the contractual requirements and/or the fulfillment of your requests, the data may be disclosed to:
 - staff of the owner
 - Credit Institutions
 - Experts and consultants
 - Audit committee
 - Supervisory board of the company
 - Health authorities (in the event of an accident or the guest's inability to give his or her data)
 - Insurance companies (in case of accidents in the facility)
 - Marketing agency (for the purposes mentioned in points 7 and 11)
 - Personnel of Aurore Development Spa, based in Cavallino Treporti (VE), with whom Villaggio Turistico Internazionale Srl has a Joint Controllershship Agreement for data processing, in order to:

a) best fulfill the accommodation requests of guests

b) carry out joint marketing activities through the sending of newsletters.

The essential content of the Joint Controllship Agreement is available at the following web address

<https://www.vti.it/informazioni-sulla-contitolarita-it-en>

- Company that provides the night porter service,
- Company that administers customer satisfaction questionnaires on our behalf,
- Companies that perform maintenance work on our ICT services and equipment.
- Affiliated companies that perform exclusively administrative, accounting, tax, technical, organizational or commercial tasks on our behalf,
- accounting, tax, technical, organizational or commercial tasks for our online services.

A transfer of the data is not provided.

The viewing of video surveillance image recordings is restricted to employers authorized by the company. In the event of aggression, theft, robbery, damage or vandalism, the recorded images are made available to the public security forces for legal proceedings and investigations.

8. Data Retention. The data will be retained for the periods indicated in the following table:

ID	Purpose of processing 	Affected category	Duration of storage 
3a)	Offers and reservations of accommodation, ancillary services and specific services. Offer of services (which do not become bookings)	Guests	10 years for tax and accounting obligations Up to 24 months
3b)	Special data processing Art. 9 for the management of emergency escape procedures for disabled guests.	Guests	Until the end of the season
3c)	Special data processing Art. 9 for the management of food intolerances of the guests.	Guests	Until the end of the year in which they were collected
3d)	to inform the police headquarters about the personal data of the accommodated clients for reasons of public safety	Guests	Within the legal deadlines (24 hours)
3e)	Control of accesses equipped with electronic locks in case of suspicion of crime (e.g. theft, robbery, damage, vandalism or possible assault).	Guests	Until the memory of the device is exhausted. When the memory is full, the device overwrites the previous data. Not longer than 1 year
3f)	Fulfillment of current administrative, accounting and tax obligations.	Guests and Suppliers	10 years
3g)	Communicate promotional initiatives, simplify and expedite registration procedures for follow-up stays, survey customer satisfaction.	Guests	7 years
3h)	Repayment of loans	Guests	Until the settlement of the legal dispute

3i)	Fraud prevention, including computer fraud	Guests and Suppliers	Until to 6 months
3j)	Management of access and movement of guests and suppliers within the relevant areas (license plates).	Guests and Suppliers	Until the end of the stay for customers end of work for suppliers
3l)	Video surveillance images' processing, in order to protect people, the owner's property, company assets and areas open to the public, involving also the presence of money or valuable assets, against possible assault, theft, robbery, damage or vandalism	Each stakeholder of the company	24 hours except on holidays, extendable to 1 week during company's closed periods.
3m)	Transmission of newsletters	Guests	The withdrawal of consent (it is possible to unsubscribe from the newsletter in every newsletter by clicking the appropriate option). Unsubscribing applies to both Joint Controllers.

9. Exercise of rights of the data subject

In relation to this data, natural persons may exercise the rights provided for in Chapter III, Articles 12 to 23 of European Regulation 679/2016. The following are the rights that may be exercised against us pursuant to Articles 15 and 16 of European Regulation 679/2016:

- I. The data subject has the right to obtain confirmation from the controller as to whether personal data concerning him or her are being processed and, if so, to obtain access to the personal data and the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular if they are recipients in third countries or international organizations
 - d) where possible, the period for which the personal data will be kept or, if this is not possible, the criteria used to determine that period
 - e) the existence of the right to obtain from the controller the rectification or erasure of personal data or the restriction of their processing, or to object to their processing
 - f) the right to lodge a complaint with a supervisory authority;
- II. The controller shall provide a copy of the personal data being processed at the request of the data subject. If the data subject makes the request by electronic means, the information shall be provided in a commonly used electronic format, unless the data subject indicates otherwise.
- III. The data subject shall have the right to obtain from the controller the rectification without delay of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to obtain the completion of incomplete personal data, including by providing a supplementary declaration.
- IV. The data subject shall have the right to obtain from the controller the erasure without delay of personal data concerning him or her where:
 - a) the personal data are no longer necessary in relation to the purposes for which they were collected;
 - b) the personal data have been processed unlawfully;

- c) the personal data must be erased in order to comply with a legal obligation under Union or Member State law to which the controller is subject.

Point IV does not apply insofar as the processing is necessary for the establishment, exercise or defense of legal claims.

If the legal basis of the processing is based on consent, the data subject may withdraw his/her consent at any time without affecting the lawfulness of the processing based on the consent given before the withdrawal.

The rights listed above may be exercised towards Villaggio Turistico Internazionale Srl and Aurore Development Spa, joint controllers of data processing, by writing to the single point of contact.