

INFORMATION pursuant to ART. 13 and 14 of the EU REGULATION 2016/679 (GDPR)

Dear User, Thank you for visiting our website www.associazionedimorestoricheitaliane.it (hereinafter the “Site”). The Associazione Dimore Storiche Italiane (the “ADSI” or “Association”) has always paid careful attention to the protection of the personal data it processes, the safeguarding of which is a fundamental asset of our Association. For these reasons we are committed to ensuring users of our Site respect and protection of their privacy. The following is a description, among other things, of the way in which the personal data collected and/or provided through the Site are processed, and we therefore inform you of the following.

1. Data Controller

The data controller is the Associazione Dimore Storiche Italiane, with registered office at Via Cavour n. 256, Rome, 00184, p.e.c. adsi@pec.it, mail info@adsi.it, C.F. 802 30750582 and P. IVA 03662671001.

2. Types of Data

2.1 (Browsing data). While browsing the Site, its normal software procedures acquire certain personal data whose transmission is implicit in the use of Internet communication protocols. This information is not intended to be associated with identified users but, when associated with other data held by third parties (e.g. your internet service provider), it could allow identification of Site users. Browsing data include IP addresses or domain names of the computers used by the user who connects to the site, the URL (Uniform Resource Locator) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system.

2.2 (Cookies). Only with your express consent, we will carry out, using electronic tools, activities of analysis and profiling in order to improve the offer of services provided through the Site, of commercial information and of market research on services provided by the Association in accordance with the interests of users. Personal data will also be processed, subject to your consent, to send the Association's commercial and promotional information, and market research on its products, services and events. It should be noted that failure to consent to profiling activities would make it impossible to improve the Association's marketing offer and make it conform to the user's interests.

For more details on cookies, see the [relative information](#).

2.3 (Data provided voluntarily by users). The user may voluntarily provide certain personal information through the Site, as required for provision of the various services offered by the Association and for association purposes. The data collected are processed on hard copy, by automated and telematic means and with a logic strictly related to processing purposes. If by connecting to the Site you intend to send your personal data, the ADSI will process this in the appropriate sections in order to respond to your request or provide the service requested, in keeping with the appropriate Privacy Policy and, where necessary, subject to your express consent. Please note that any voluntary sending of electronic mail by the user of the Site to the e-mail addresses indicated on the site entails the acquisition of the sender's address along with other information contained in the message; such personal data will be used solely for the purpose of providing the service requested.

3. Methods and Principles of Processing.

The processing of the data will take place in compliance with the GDPR, Legislative Decree no. 196/03 and Legislative Decree 101/2018 and subsequent amendments, and with the principles of lawfulness, correctness

and transparency, minimisation, relevance, proportionality, adequacy and limitation of storage, using paper and electronic methods, by persons authorised by the Association and with the adoption of appropriate protection measures, to ensure the security, integrity and confidentiality of the data. The processing operations related to the web services offered by the Site take place at the Association's head office and possibly at the offices of external data processors. They are carried out by data processors charged with managing the services requested, marketing activities, if requested by the user, data storage activities and maintenance operations.

4. Purposes and Legal Basis of Data Processing

For the sake of convenience and ease of understanding, here is a list of the purposes for which we process your personal data and the relevant legal basis for such processing.

| PURPOSE | LEGAL BASIS |
|--|---|
| To measure your experience in using the Site and to ensure the correct functioning of its web pages and related content. | Such use is based on a legitimate interest of the data controller |
| (Marketing) To inform you about commercial initiatives, also by automated means, relating to promotions and/or offers, in the interest of the data controller. | Such processing is carried out after specific consent has been provided by the user, except for commercial communications relating to products and/or services similar to those already subscribed to by the user, for which the processing is based on a legitimate interest of the data controller to whom the user may, in any case, object. |
| To provide the service requested by the user, to manage the contracts to which the user is a party, to carry out the relative administrative, accounting, fiscal and legal requirements, and to process the requests forwarded by the user. | The processing carried out for these purposes is necessary for the fulfilment of contractual obligations and does not require the specific consent of the person concerned. With regard to the data provided voluntarily by the user, please refer to the specific information on the individual services . |
| To carry out analysis and processing of information relating to users, their preferences, habits, consumer choices and/or browsing experiences (so-called profiling). This activity is also carried out with cookies. For all details on cookies and the legal basis of the processing of data acquired through them, please refer to the relevant information . | The processing carried out for these purposes is performed subject to the user's specific consent, apart from the analysis of elementary information relating to the user's consumer preferences, which are acquired automatically. |
| To communicate your data for commercial and/or promotional purposes to third party partners of the Association such as, for example, subjects operating in the field of consultancy, insurance etc. | Processing for these purposes is carried out subject to the user's specific consent. |

5. Communication and transfer of data

Browsing data and data collected through cookies may be communicated

- to all duly informed people who carry out activities which the Association is legally obliged to perform;
- to all those natural and/or legal, public and/or private persons when such communication is necessary or related to the performance of the ADSI's institutional activities, including those that can be supplied through the Site

- to recipients based outside the EU (e.g. Google or Mailchimp for the purposes of newsletter management or the archiving or management of documents in the cloud) who have signed agreements aimed at ensuring an adequate level of personal data protection, or in any case subject to verification that the recipient guarantees adequate protection measures.

Where necessary or appropriate, the persons to whom the data is transmitted for the performance of activities on behalf of the Association shall be appointed as data processors pursuant to Article 28 GDPR, a list of whom is available at the Association's headquarters.

With regard to the data provided directly by the user, please refer to the [relevant information](#).

6. Data retention.

The Data Controller retains your personal data for as long as necessary to achieve the purposes for which they were collected. In addition, the Data Controller retains your personal data if required to do so by regulatory obligations and until the expiry of the statute of limitations in order to enforce any existing legal claims.

Personal data will be stored as hard copy and/or in electronic/digital form.

For the purposes of direct marketing and profiling, we will keep your data for a maximum time equal to that provided for by the applicable legislation (24 and 12 months respectively).

For analysis purposes aimed at developing and improving the service, your personal data may be subject to a retention period of 36 months.

In the event of exercising the right to be forgotten through a request for express deletion of personal data held by the Data Controller, we remind you that such data will be stored, in a protected form and with limited access, solely for the purposes of investigating and prosecuting crimes, for a period not exceeding twelve months from the date of the request and will subsequently be securely deleted or irreversibly anonymised.

We also inform you that for these purposes, data relating to telematic traffic, excluding the contents of communications, will be stored for a period not exceeding six years from the date of communication, pursuant to Article 24 of Law No. 167/2017, which implemented EU Directive 2017/541 on anti-terrorism.

Personal data are stored on servers located within the European Union. It remains in any case understood that, should it become necessary, the Data Controller shall have the right to move the servers outside the EU. In this case, the Data Controller assures as of now that the transfer of data outside the EU will take place in compliance with the applicable legal provisions, subject to the stipulation of the standard contractual clauses provided for by the European Commission.

7. Rights of the Data Subject

In your capacity as data subject, you are guaranteed all the rights specified in Art. 15 et seq. of the GDPR, including the right to access, rectify and cancel data, the right to restrict and object to processing, the right to withdraw consent to processing (without prejudice to the lawfulness of processing based on consent obtained prior to withdrawal), as well as the right to lodge a complaint with the Guarantor for the Protection of Personal Data if you believe that processing concerning you is in breach of the Regulations. The above mentioned rights may be exercised by written communication sent by e-mail, P.E.C. or fax, or by registered letter to the Association's registered office and by e-mail to soci@adsi.it.

8. Security measures

The Association uses “secure” technologies to protect personal data in order to minimise the risks of destruction or loss of data, unauthorised access or processing that is not permitted or does not comply with the purposes of its collection.