



PRIVACY POLICY

The European Regulation No. 679/2016 applicable in all Member States recognizes that every person has the protection of his or her personal data that are processed by third parties, as an expression of respect for human dignity and the fundamental rights and freedoms of the individual.

The information contained in this notice is provided pursuant to Article 13 of EU Regulation 2016/679 of 27 April 2016 on the "protection of individuals with regard to the processing of personal data" (hereinafter, the "EU Regulation") and applicable national legislation. Unless otherwise specified, this privacy policy relates exclusively to www.royalparkgolf.it.

On the basis of the provisions of the aforementioned Regulation, we wish to inform you that your data will be processed by us in full compliance with the principles of lawfulness, correctness and transparency and protection of the confidentiality of your data and rights in accordance with the provisions of the aforementioned law.

This information is aimed at persons aged 16 years or over who, after registering on the Sites or Applications, will use the relevant Services.

1. The purposes of processing

The Owner collects the Data concerning the User to provide its services and for the following purposes: contacting the User, managing contacts and sending messages, advertising, interaction with external social networks and platforms, heat mapping and session recording, analytics, remarketing and behavioral targeting, hosting and backend infrastructure, SPAM protection and displaying content from external platforms.

To find out more about such purposes and about the specific Personal Data used for each purpose please read the respective sections of this document.

2. Types of data collected

If you are browsing this website without registering or otherwise providing information to us, then for informational purposes only, we will only collect personally identifiable information that your browser transmits to our server. If you wish to browse our website, we collect the following data, either independently or through third parties, which we technically need to make our website viewable and to ensure its stability and security:

email, cookies, usage data, surname, first name, address, country, province, postcode, telephone number, various types of data, city and unique identifiers of advertising devices (Google Advertiser ID or IDFA identifier, for example).

Specific information texts displayed prior to the collection of the data itself or in the dedicated sections of this privacy policy provide details on each type of data.

Personal Data may be, in the case of Usage Data, collected automatically during the use of the Royal Park Golf & Country Club I Roveri S.S.D. a R.L. website or may be freely provided by the User.

Any use of Cookies - or other tracking tools - by Royal Park Golf & Country Club I Roveri S.S.D. a R.L. or by the owners of third-party services used by the Company, unless otherwise specified, is for the purpose of providing the Service requested by the User, in addition to the further purposes described in this document.



The User assumes responsibility for the Personal Data of third parties obtained, published or shared and guarantees that he/she has the right to communicate or disseminate them, relieving the Owner from any responsibility towards third parties.

3. Processing methods

The Data Controller has taken extensive technical and operational security precautions to protect your data from accidental or intentional manipulation, loss, destruction or access by unauthorized persons. Our security measures are regularly reviewed and updated to keep pace with technological advances.

In addition to the Data Controller, other subjects involved in the organization (administrative, commercial, marketing, legal, system administrators) or external subjects (such as third-party technical service providers, postal couriers, IT companies, communication agencies, hosting providers) also appointed as Data Processors by the Data Controller, if necessary, may have access to the Data. An updated list of the Data Processors may be requested from the Data Controller at any time.

4. Place of processing

In order to provide the service and for the processing purposes listed in this Privacy Policy, the operations relating to the processing of Personal Data are carried out at the administrative offices of the Data Controller and in any other place where the parties involved in such processing are located.

Within the scope of the purposes described in this Privacy Policy, Users' Personal Data may be transferred to a country other than the one where the User is located.

You have the right to obtain information about the legal basis for the transfer of Data outside the EU (European Union) or to an international organization under public international law or consisting of two or more countries (such as the UN), and also about the security measures taken by the Data Controller to protect the Data.

For further information, the User may contact the Data Controller at the Contact Information indicated in this Privacy Policy.

5. Legal basis for processing

The Data Controller processes Personal Data relating to the User if one of the following conditions exists:

- the User has given consent for one or more specific purposes; Note: in some jurisdictions, the Controller may be allowed to process Personal Data without the User's consent or another of the legal bases specified below, until the User objects ("opts out") to such processing. This does not apply where the processing of Personal Data is governed by European legislation on the protection of Personal Data;
- processing is necessary for the performance of a contract with the User and/or the performance of pre-contractual measures;
- the processing is necessary for the performance of a legal obligation to which the Controller is subject;
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of public powers vested in the Controller;
- processing is necessary for the pursuit of the legitimate interests of the Controller or of third parties.



It is always possible to ask the Controller to clarify the concrete legal basis of each processing operation and in particular to specify whether the processing is based on law, required by a contract or necessary to conclude a contract.

6. Data retention period

The Data are processed and stored for the time required by the purposes for which they were collected and the Data Controller will process said Data:

- for the entire duration of subscription services and newsletter subscription;
- 10 years for the purpose of storing accounting documents pursuant to Article 2220 of the Civil Code;
- 10 years for marketing purposes, unless consent is revoked and the newsletter is cancelled.

When the processing is based on the User's consent, the Data Controller may store the Personal Data beyond this period, until such consent is revoked. In addition, it may happen that the Controller is obliged to keep the Personal Data for a longer period, due to a legal obligation or by order of an authority.

At the end of the aforementioned retention period, the Personal Data will be deleted. Therefore, once this period has expired, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

7. Data Controller

The data controller is ROYAL PARK GOLF I ROVERI S.S.D A R.L., with registered office in Fiano (TO), Rotta Cerbiatta, 24, tax code and VAT number 09239790018.

The owner's email address is info@royalparkgolf.it.

8. Rights of the interested party

At any time, the user may exercise, with a written request, against the Data Controller identified above, all the rights recognized by the applicable European and domestic legislation and in particular by Articles 13, 14, 15 to 22 and 34 of the European Regulation and the national legislation in force, and in particular:

- a) the right to obtain, free of charge, access to and/or a copy of your personal data being processed with an indication of all aspects relevant to the processing provided for by the EU Reg;
- b) the right to obtain, free of charge, the updating, rectification of inaccurate data, the restriction of processing or, where interested, the integration of data;
- c) the right to request deletion of personal data - the so-called "right to be forgotten" (i.e. the right to request deletion if the data are no longer necessary for the purposes for which they were collected/processed, if he/she has revoked his/her consent and there is no other legal basis for processing, if he/she objects to the processing, etc.);
- d) the right to object, in whole or in part, to the processing of personal data concerning him/her, even though they are relevant to the purposes of collection for legitimate reasons, or to withdraw, in whole or in part, his/her consent;
- e) the right to lodge a complaint with a supervisory authority or judicial authority.

The full list of the data subject's rights is available in paper form at the Data Controller's head office or by email upon written request. In order to exercise their rights, Users may



address a request to the contact details of the Controller indicated in this document. Requests are filed free of charge and processed by the Controller as soon as possible.

9. Definitions and legal references

Personal data (or Data): personal data is defined as any information which, directly or indirectly, including in conjunction with other information, thus including a personal identification number, makes a natural person identified or identifiable.

Usage data: this is the information collected through www.royalparkgolf.it (including by third party applications integrated into www.royalparkgolf.it), including: IP addresses or domain names of the computers used by the User who connects with www.royalparkgolf.it, URI (Uniform Resource Identifier) notation addresses, the time of the request, the method used to send the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response from the server (successful, error, etc.), the country of origin, information on the browser and operating system used by the visitor, the various temporal connotations of the visit (e.g. the time spent on each page) and details of the path followed within the Application, with particular attention to the sequence of pages consulted, the parameters relating to the operating system and the User's IT environment.

User: the individual who uses www.royalparkgolf.it must coincide with or be authorized by the Data Subject and whose Personal Data is being processed.

Data subject: the natural or legal person to whom the Personal Data refer.

Data Processor (or Data Processor): the natural person, legal entity, public administration and any other body, association or organization assigned by the Data Controller to the processing of Personal Data, in accordance with the provisions of this Privacy Policy.

Data Controller (or Controller): the natural or legal person, public authority, service or other body which, individually or jointly with others, determines the purposes and means of the processing of personal data and the instruments adopted, thus including the security measures relating to the operation and use of www.royalparkgolf.it.

The Data Controller, unless otherwise specified, is the owner of www.royalparkgolf.it.

Service: the Service provided by www.royalparkgolf.it as defined in the relevant terms (if any) on this website/application.

European Union (or EU): unless otherwise specified, any reference to the European Union in this document shall be deemed to extend to all current member states of the European Union and the European Economic Area.

Cookie: small portion of data stored within the User's device.