Privacy Policy of www.hotelicolli.com

Www.hotelicolli.com collects some Personal Data from its Users.

Owner and Data Controller

I Colli Srl - Via Santa Margherita 12/B 60124 Ancona (AN) - P.Iva 02704320429

Owner contact email: info@hotelicolli.com

Types of Data collected

Among the types of Personal Data that www.hotelicolli.com collects, by itself or through third parties, there are: Trackers; Usage Data; first name; last name; phone number; email address; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Data communicated while using the service; number of Users; city; device information; session statistics; latitude (of city); longitude (of city); browser information.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using www.hotelicolli.com.

Unless specified otherwise, all Data requested by www.hotelicolli.com is mandatory and failure to provide this Data may make it impossible for www.hotelicolli.com to provide its services. In cases where www.hotelicolli.com specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools — by www.hotelicolli.com or by the owners of third-party services used by www.hotelicolli.com serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy.

Users are responsible for any third-party Personal Data obtained, published or shared through www.hotelicolli.com.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of www.hotelicolli.com (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Interaction with external social networks and platforms, Analytics, Displaying content from external platforms, Contacting the User, Tag Management, Backup saving and management, SPAM protection, Remarketing and behavioural targeting, Advertising, Collection of privacy-related preferences and Hosting and backend infrastructure.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Advertising

This type of service allows User Data to be utilised for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on www.hotelicolli.com, possibly based on User interests. This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below. Some of the services listed below may use Trackers to identify Users or they may use the behavioural retargeting technique, i.e. displaying ads tailored to the User's interests and behaviour, including those detected outside www.hotelicolli.com. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Meta Audience Network (Meta Platforms, Inc.)

Meta Audience Network is an advertising service provided by Meta Platforms, Inc. In order to understand Facebook's use of Data, consult <u>Facebook's data policy</u>.

Www.hotelicolli.com may use identifiers for mobile devices (including Android Advertising ID or Advertising Identifier for iOS, respectively) and technologies similar to cookies to run the Meta Audience Network service. One of the ways Audience Network shows ads is by using the User's ad preferences. The User can control this in the <u>Facebook ad settings</u>.

Users may opt-out of certain Audience Network targeting through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Audience Network related sections of this privacy policy, if available.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); Usage Data

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Meta ads conversion tracking (Meta pixel) (Meta Platforms, Inc.)

Meta ads conversion tracking (Meta pixel) is an analytics service provided by Meta Platforms, Inc. that connects data from the Meta Audience Network with actions performed on www.hotelicolli.com. The Meta pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Meta Audience Network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt out.

Google Ads conversion tracking

Google Ads conversion tracking is an analytics service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Google Ads advertising network with actions performed on www.hotelicolli.com.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy; Ireland – Privacy Policy.

Analytics

The services contained in this section enable the Owner to monitor and analyse web traffic and can be used to keep track of User behaviour.

Google Analytics (Universal Analytics) (Google LLC)

Google Analytics (Universal Analytics) is a web analysis service provided by Google LLC ("Google"). Google utilises the Data collected to track and examine the use of www.hotelicolli.com, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualise and personalise the ads of its own advertising network.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Opt Out.

User ID extension for Google Analytics (Google LLC)

Google Analytics on www.hotelicolli.com makes use of a feature called User ID. This setup allows for a more accurate tracking of Users by associating that User with the same ID over various sessions and devices. It is set up in a way that doesn't allow Google to personally identify an individual or permanently identify a particular device.

The User ID extension might make it possible to connect Data from Google Analytics with other Data about the User collected by www.hotelicolli.com.

The opt-out link below will only opt you out for the device you are on, but not from tracking performed independently by the Owner. Contact the Owner via the email address provided in this privacy policy to object to the aforementioned tracking as well.

Personal Data processed: Trackers.

Place of processing: United States – Privacy Policy – Opt Out.

Google Analytics Advertising Reporting Features (Google LLC)

Google Analytics on www.hotelicolli.com has Advertising Reporting Features activated, which collects additional information from the DoubleClick cookie (web activity) and from device advertising IDs (app activity). It allows the Owner to analyse specific behaviour and interests Data (traffic Data and Users' ads interaction Data) and, if enabled, demographic Data (information about the age and gender).

Users can opt out of Google's use of cookies by visiting Google's Ads Settings.

Personal Data processed: Trackers; unique device identifiers for advertising (Google Advertiser ID or IDFA, for example); various types of Data as specified in the privacy policy of the service.

Place of processing: United States – Privacy Policy – Opt Out.

Google Analytics with anonymised IP (Google LLC)

Google Analytics is a web analysis service provided by Google LLC ("Google"). Google utilises the Data collected to track and examine the use of www.hotelicolli.com, to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualise and personalise the ads of its own advertising network. This integration of Google Analytics anonymises your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>.

Google Analytics 4

Google Analytics 4 is a web analysis service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, ("Google"). Google utilizes the Data collected to track and examine the use of www.hotelicolli.com, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

In Google Analytics 4, IP addresses are used at collection time and then discarded before Data is logged in any data center or server. Users can learn more by consulting <u>Google's official documentation</u>.

Personal Data processed: browser information; city; device information; latitude (of city); longitude (of city); number of Users; session statistics; Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

Backup saving and management

This type of service allows the Owner to save and manage backups of www.hotelicolli.com on external servers managed by the service provider itself. The backups may include the source code and content as well as the data that the User provides to www.hotelicolli.com.

Backup on Google Drive (Google LLC)

Google Drive is a service to save and manage backups provided by Google LLC.

Personal Data processed: various types of Data as specified in the privacy policy of the service.

Place of processing: United States – <u>Privacy Policy</u>.

Collection of privacy-related preferences

This type of service allows www.hotelicolli.com to collect and store Users' preferences related to the collection, use, and processing of their personal information, as requested by the applicable privacy legislation.

iubenda Consent Solution (iubenda srl)

The iubenda Consent Solution allows to store and retrieve records of Users' consent to the processing of Personal Data, and information and preferences expressed in relation to the provided consent.

In order to do so, it makes use of a Tracker that temporarily stores pending information on the User's device until it is processed by the API. The Tracker (a browser feature called localStorage) is at that point deleted.

Personal Data processed: Data communicated while using the service; Trackers.

Place of processing: Italy – Privacy Policy.

iubenda Cookie Solution (iubenda srl)

The iubenda Cookie Solution allows the Owner to collect and store Users' preferences related to the processing of personal information and in particular to the use of Cookies and other Trackers on www.hotelicolli.com.

Personal Data processed: Trackers.

Place of processing: Italy – Privacy Policy.

Contacting the User

Contact form (www.hotelicolli.com)

By filling in the contact form with their Data, the User authorises www.hotelicolli.com to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header.

Personal Data processed: email address; first name; last name; phone number.

Mailing list or newsletter (www.hotelicolli.com)

By registering on the mailing list or for the newsletter, the User's email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning www.hotelicolli.com. Your email address might also be added to this list as a result of signing up to www.hotelicolli.com or after making a purchase.

Personal Data processed: email address; first name; last name; Trackers; Usage Data.

Phone contact (www.hotelicolli.com)

Users that provided their phone number might be contacted for commercial or promotional purposes related to www.hotelicolli.com, as well as for fulfilling support requests.

Personal Data processed: phone number.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of www.hotelicolli.com and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

Google Maps widget (Google LLC)

Google Maps is a maps visualisation service provided by Google LLC that allows www.hotelicolli.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Google Fonts (Google LLC)

Google Fonts is a typeface visualisation service provided by Google LLC that allows www.hotelicolli.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u>.

Video Vimeo (Vimeo, LLC)

Vimeo is a video content visualisation service provided by Vimeo, LLC that allows www.hotelicolli.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

YouTube video widget (Google LLC)

YouTube is a video content visualisation service provided by Google LLC that allows www.hotelicolli.com to incorporate content of this kind on its pages.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Hosting and backend infrastructure

This type of service has the purpose of hosting Data and files that enable www.hotelicolli.com to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of www.hotelicolli.com.

Some services among those listed below, if any, may work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Serverplan (Server Plan srl)

Serverplan is a hosting and backend service provided by Server Plan srl.

Personal Data processed: Usage Data.

Place of processing: Italy – Privacy Policy.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of www.hotelicolli.com.

The interaction and information obtained through www.hotelicolli.com are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it. It is recommended to log out from the respective services in order to make sure that the processed data on www.hotelicolli.com isn't being connected back to the User's profile.

Facebook Like button and social widgets (Meta Platforms, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Meta Platforms, Inc.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Remarketing and behavioural targeting

This type of service allows www.hotelicolli.com and its partners to inform, optimise and serve advertising based on past use of www.hotelicolli.com by the User.

This activity is facilitated by tracking Usage Data and by using Trackers to collect information which is then transferred to the partners that manage the remarketing and behavioural targeting activity.

Some services offer a remarketing option based on email address lists.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Remarketing with Google Analytics (Google LLC)

Remarketing with Google Analytics is a remarketing and behavioural targeting service provided by Google LLC that connects the tracking activity performed by Google Analytics and its Trackers with the Google Ads advertising network and the Doubleclick Cookie.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Facebook Custom Audience (Meta Platforms, Inc.)

Facebook Custom Audience is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. that connects the activity of www.hotelicolli.com with the Facebook advertising network.

Users can opt out of Facebook's use of Trackers for ads personalisation by visiting this opt-out page.

Personal Data processed: email address; Trackers.

Place of processing: United States – Privacy Policy – Opt Out.

Facebook Remarketing (Meta Platforms, Inc.)

Facebook Remarketing is a remarketing and behavioural targeting service provided by Meta Platforms, Inc. that connects the activity of www.hotelicolli.com with the Facebook advertising network.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy – Opt Out.

Google Signals

Www.hotelicolli.com uses Google Signals, a feature of Google Analytics, which will associate the visitation information that it collects from www.hotelicolli.com with Google information from accounts of signed-in Google-account users who have consented to this association for the purpose of ads personalisation. This Google information may include User location, search history, YouTube history and Data from sites that partner with Google – and is used to provide aggregated and anonymised insights into Users' cross device behaviours.

If a User falls under the described association, they may access and/or delete such Data via My Activity provided by Google.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – <u>Privacy Policy</u> – <u>Opt Out</u>; Ireland – <u>Privacy Policy</u> – <u>Opt Out</u>.

SPAM protection

This type of service analyses the traffic of www.hotelicolli.com, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognised as SPAM.

Google reCAPTCHA (Google LLC)

Google reCAPTCHA is a SPAM protection service provided by Google LLC. The use of reCAPTCHA is subject to the Google <u>privacy policy</u> and <u>terms of use</u>.

In order to understand Google's use of Data, consult Google's partner policy.

Personal Data processed: answers to questions; clicks; keypress events; motion sensor events; mouse movements; scroll position; touch events; Trackers; Usage Data.

Place of processing: United States.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on www.hotelicolli.com in a centralised fashion. This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.

Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data processed: Trackers; Usage Data.

Place of processing: United States – Privacy Policy.

Information on opting out of interest-based advertising

In addition to any opt-out feature provided by any of the services listed in this document, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section of the Cookie Policy.

Cookie Policy

Www.hotelicolli.com uses Trackers. To learn more, Users may consult the Cookie Policy.

Further Information for Users

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes.
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner:
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period

whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following, to the extent permitted by law:

- Withdraw their consent at any time. Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- Object to processing of their Data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- Access their Data. Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- Verify and seek rectification. Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- Have their Personal Data deleted or otherwise removed. Users have the right to obtain the erasure of their Data from the Owner.
- Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- Lodge a complaint. Users have the right to bring a claim before their competent data protection authority.

Users are also entitled to learn about the legal basis for Data transfers abroad including to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time, free of charge and without providing any justification. Where the User objects to processing for direct marketing purposes, the Personal Data will no longer be processed for such purposes. To learn whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. Such requests are free of charge and will be answered by the Owner as early as possible and always within one month, providing Users with the information required by law. Any rectification or erasure of Personal Data or restriction of processing will be communicated by the Owner to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Users' request, the Owner will inform them about those recipients.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of www.hotelicolli.com or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, www.hotelicolli.com may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, www.hotelicolli.com and any third-party services may collect files that record interaction with www.hotelicolli.com (System logs) or use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within www.hotelicolli.com and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Personal Data (or Data)

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through www.hotelicolli.com (or third-party services employed in www.hotelicolli.com), which can include: the IP addresses or domain names of the computers utilised by the Users who use www.hotelicolli.com, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilised to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilised by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using www.hotelicolli.com who, unless otherwise specified, coincides with the Data Subject.

Data Subject

The natural person to whom the Personal Data refers.

Data Processor (or Processor)

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

Data Controller (or Owner)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of www.hotelicolli.com. The Data Controller, unless otherwise specified, is the Owner of www.hotelicolli.com.

www.hotelicolli.com (or this Application)

The means by which the Personal Data of the User is collected and processed.

Service

The service provided by www.hotelicolli.com as described in the relative terms (if available) and on this site/application.

European Union (or EU)

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Users, for example by accessing or storing information on the User's device.

Legal information

This privacy policy relates solely to www.hotelicolli.com, if not stated otherwise within this document.

Latest update: 8 March 2024