Cookie Policy of lepalmehotel.com

To find more information on California consumers and their privacy rights, Users may read the privacy policy.

To find more information on Virginia consumers and their privacy rights, Users may read the privacy policy.

To find more information on Colorado consumers and their privacy rights, Users may read the privacy policy.

To find more information on Connecticut consumers and their privacy rights, Users may read the privacy policy.

To find more information on Utah consumers and their privacy rights, Users may read the privacy policy.

This document informs Users about the technologies that help this Website to achieve the purposes described below. Such technologies allow the Owner to access and store information (for example by using a Cookie) or use resources (for example by running a script) on a User's device as they interact with this Website.

For simplicity, all such technologies are defined as "Trackers" within this document – unless there is a reason to differentiate. For example, while Cookies can be used on both web and mobile browsers, it would be inaccurate to talk about Cookies in the context of mobile apps as they are a browser-based Tracker. For this reason, within this document, the term Cookies is only used where it is specifically meant to indicate that particular type of Tracker.

Some of the purposes for which Trackers are used may also require the User's consent. Whenever consent is given, it can be freely withdrawn at any time following the instructions provided in this document.

This Website uses Trackers managed directly by the Owner (so-called "first-party" Trackers) and Trackers that enable services provided by a third-party (so-called "third-party" Trackers). Unless otherwise specified within this document, third-party providers may access the Trackers managed by them.

The validity and expiration periods of Cookies and other similar Trackers may vary depending on the lifetime set by the Owner or the relevant provider. Some of them expire upon termination of the User's browsing session.

In addition to what's specified in the descriptions within each of the categories below, Users may find more precise and updated information regarding lifetime specification as well as any other relevant information — such as the presence of other Trackers — in the linked privacy policies of the respective third-party providers or by contacting the Owner.

Activities strictly necessary for the operation of this Website and delivery of the Service

This Website uses so-called "technical" Cookies and other similar Trackers to carry out activities that are strictly necessary for the operation or delivery of the Service.

Third-party Trackers

Tag Management

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

Google Tag Manager

Google Tag Manager is a tag management service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing.

Personal Data processed: Trackers and Usage Data.

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

Collection of privacy-related preferences

This type of service allows this Website 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 and Trackers.

Place of processing: Italy – Privacy Policy.

Storage duration:

• ConS JS library localStorage (IUB DATA): indefinite

Other Trackers

Hosting and backend infrastructure

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

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.

Hosting Service

Provider

VULTR Holdings Corporation - VAT EU372005690 - 319 Clematis Street Suite 900 West Palm Beach, FL 33401 - USA - https://www.vultr.com/legal@vultr.com

Purposes

Cloud Hosting

Personal data collected

Various types of data as specified in the privacy policy of the service

Privacy Policy

The cloud hosting service is provided by Vultr Holdings Corporation

https://www.vultr.com/legal/privacy/ https://www.vultr.com/legal/gdpr/ https://www.vultr.com/legal/ccpa/

Other activities involving the use of Trackers

Functionality

This Website uses Trackers to enable basic interactions and functionalities, allowing Users to access selected features of the Service and facilitating the User's communication with the Owner.

Selling goods and services online

This type of service helps the Owner to sell goods, provide services or monetize online content. To this end, the services listed below may for instance allow the Owner to process payments, set up subscription models, track orders, and manage deliveries.

Online Reservation Service

Provider

Ericsoft SRL - VAT Number: 04211680402 - Via Adriatica, 62 - Misano Adriatico (RN) - Italy

info@ericsoft.com

Purposes

Online Reservation Service

Personal data collected

Name, Surname, Email, Phone number, Address, City, Postcode, Various Types of Data as specified in the privacy policy of the service

Privacy Policy

The service allows the user to book online and is provided by Ericsoft Srl

https://booking.ericsoft.com/Policies/Privacy/it/1A372FF699FF4099

https://www.ericsoft.com/it/gdpr-2018#

https://www.ericsoft.com/#

Experience

This Website uses Trackers to improve the quality of the user experience and enable interactions with external content, networks and platforms.

Content commenting

Content commenting services allow Users to make and publish their comments on the contents of this Website.

Depending on the settings chosen by the Owner, Users may also leave anonymous comments. If there is an email address among the Personal Data provided by the User, it may be used to send notifications of comments on the same content. Users are responsible for the content of their own comments.

If a content commenting service provided by third parties is installed, it may still collect web traffic data for the pages where the comment service is installed, even when Users do not use the content commenting service.

Facebook Comments

Facebook Comments is a content commenting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, enabling the User to leave comments and share them on the Facebook platform.

Personal Data processed: Trackers and Usage Data.

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

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Website 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 Fonts (Google Ireland Limited)

Google Fonts is a typeface visualization service provided by Google Ireland Limited that allows this Website to incorporate content of this kind on its pages.

Personal Data processed: Trackers and Usage Data.

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

Measurement

This Website uses Trackers to measure traffic and analyze User behavior to improve the Service.

Analytics

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

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 this Website, 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 Google's official documentation.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

_ga: 2 years_ga_*: 2 years

Google Analytics Demographics and Interests reports

Google Analytics Demographics and Interests reports is a Google Advertising Reporting feature that makes available demographic and interests Data inside Google Analytics for this Website (demographics means age and gender Data).

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

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

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

Storage duration:

IDE: 2 years_gcl_*: 3 monthstest_cookie: 15 minutes

Facebook Ads conversion tracking (Facebook pixel)

Facebook Ads conversion tracking (Facebook pixel) is an analytics service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects data from the Meta advertising network with actions performed on this Website. The Facebook pixel tracks conversions that can be attributed to ads on Facebook, Instagram and Audience Network.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

fbp: 3 monthsfr: 3 months

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 this Website.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

• IDE: 2 years

• test_cookie: 15 minutes

Meta Events Manager (Meta Platforms Ireland Limited)

Meta Events Manager is an analytics service provided by Meta Platforms Ireland Limited. By integrating the Meta pixel, Meta Events Manager can give the Owner insights into the traffic and interactions on this Website.

Personal Data processed: Trackers and Usage Data.

Place of processing: Ireland – Privacy Policy.

Storage duration:

• fbp: 3 months

Marketing

This Website uses Trackers to deliver personalized marketing content based on User behavior and to operate, serve and track ads.

Advertising

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Website, 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 behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Website. 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.

Facebook Lookalike Audience

Facebook Lookalike Audience is an advertising and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that uses Data collected through Facebook Custom Audience in order to display ads to Users with similar behavior to Users who are already in a Custom Audience list on the base of their past use of this Website or engagement with relevant content across the Facebook apps and services.

On the base of these Data, personalized ads will be shown to Users suggested by Facebook Lookalike Audience.

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• _fbp: 3 months

Google Ads Similar audiences

Similar audiences is an advertising and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that uses Data from Google Ads Remarketing in order to display ads to Users with similar behavior to Users who are already on the remarketing list due to their past use of this Website. On the basis of this Data, personalized ads will be shown to Users suggested by Google Ads Similar audiences.

Users who don't want to be included in Similar audiences can opt out and disable the use of advertising Trackers by going to: Google Ad Settings.

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

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• AID: 2 years

• ANID: 2 years

• Conversion: 3 months

• DSID: 14 days

• FCNEC: 1 year

• FLC: 10 seconds

• FPAU: 3 months

• FPGCLAW: 3 months

• FPGCLDC: 3 months

• FPGCLGB: 3 months

• IDE: 2 years

• NID: 6 months

• RUL: 1 year

• TAID: 14 days

• __gads: 2 years

• __gsas: 2 years

• gac : 3 months

- _gac_gb_: 3 months
- _gcl_au: 3 months
- _gcl_aw: 3 months
- _gcl_dc: 3 months
- _gcl_gb: 3 months
- _gcl_gf: 3 months
- _gcl_ha: 3 months
- id: 2 years
- test_cookie: 15 minutes

Remarketing and behavioral targeting

This type of service allows this Website and its partners to inform, optimize and serve advertising based on past use of this Website 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 behavioral 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

Remarketing with Google Analytics is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, 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 and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• test cookie: 15 minutes

IDE: 2 yearsgcl *: 3 months

Facebook Remarketing

Facebook Remarketing is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Facebook advertising network.

Personal Data processed: Trackers and Usage Data.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• fbp: 3 months

Facebook Custom Audience

Facebook Custom Audience is a remarketing and behavioral targeting service provided by Meta Platforms, Inc. or by Meta Platforms Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Facebook advertising network.

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

Personal Data processed: email address and Trackers.

Place of processing: United States - Privacy Policy - Opt Out; Ireland - Privacy Policy - Opt Out.

Storage duration:

• _fbp: 3 months

Google Ads Remarketing

Google Ads Remarketing is a remarketing and behavioral targeting service provided by Google LLC or by Google Ireland Limited, depending on how the Owner manages the Data processing, that connects the activity of this Website with the Google Ads advertising network and the DoubleClick Cookie.

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

Users can opt out of Google's use of Trackers for ads personalization by visiting Google's Ads Settings.

Personal Data processed: Trackers and Usage Data.

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

Storage duration:

- AID: 2 years
- ANID: 2 years
- Conversion: 3 months
- DSID: 14 days
- FCNEC: 1 year
- FLC: 10 seconds
- FPAU: 3 months
- FPGCLAW: 3 months
- FPGCLDC: 3 months
- FPGCLGB: 3 months
- IDE: 2 years
- NID: 6 months
- RUL: 1 year
- TAID: 14 days
- gads: 2 years
- __gsas: 2 years
- gac: 3 months
- _gac_gb_: 3 months
- _gcl_au: 3 months
- gcl aw: 3 months
- _gcl_dc: 3 months
- _gcl_gb: 3 months
- _gcl_gf: 3 months
- _gcl_ha: 3 months
- id: 2 years
- test cookie: 15 minutes

How to manage preferences and provide or withdraw consent

There are various ways to manage Tracker related preferences and to provide and withdraw consent, where relevant:

Users can manage preferences related to Trackers from directly within their own device settings, for example, by preventing the use or storage of Trackers.

Additionally, whenever the use of Trackers is based on consent, Users can provide or withdraw such consent by setting their preferences within the cookie notice or by updating such preferences accordingly via the relevant consent-preferences privacy widget, if available.

It is also possible, via relevant browser or device features, to delete previously stored Trackers, including those used to remember the User's initial consent preferences.

Other Trackers in the browser's local memory may be cleared by deleting the browsing history.

With regard to any third-party Trackers, Users can manage their preferences via the related opt-out link (where provided), by using the means indicated in the third party's privacy policy, or by contacting the third party.

Locating Tracker Settings

Users can, for example, find information about how to manage Cookies in the most commonly used browsers at the following addresses:

- Google Chrome
- Mozilla Firefox
- Apple Safari
- Microsoft Internet Explorer

- Microsoft Edge
- Brave
- Opera

Users may also manage certain categories of Trackers used on mobile apps by opting out through relevant device settings such as the device advertising settings for mobile devices, or tracking settings in general (Users may open the device settings and look for the relevant setting).

How to opt out of interest-based advertising

Notwithstanding the above, Users may follow the instructions provided by <u>YourOnlineChoices</u> (EU and UK), the <u>Network Advertising Initiative</u> (US) and the <u>Digital Advertising Alliance</u> (US), <u>DAAC</u> (Canada), <u>DDAI</u> (Japan) or other similar services. Such initiatives allow Users to select their tracking preferences for most of the advertising tools. The Owner thus recommends that Users make use of these resources in addition to the information provided in this document.

The Digital Advertising Alliance offers an application called <u>AppChoices</u> that helps Users to control interest-based advertising on mobile apps.

Consequences of denying the use of Trackers

Users are free to decide whether or not to allow the use of Trackers. However, please note that Trackers help this Website to provide a better experience and advanced functionalities to Users (in line with the purposes outlined in this document). Therefore, if the User chooses to block the use of Trackers, the Owner may be unable to provide related features.

Owner and Data Controller

Hotel Le Palme di D'Addario Bruna - Corso Cavour 130 28040 Dormelletto (NO) - Italia P.IVA 02010730030

Owner contact email: info@lepalmehotel.com

Since the use of third-party Trackers through this Website cannot be fully controlled by the Owner, any specific references to third-party Trackers are to be considered indicative. In order to obtain complete information, Users are kindly requested to consult the privacy policies of the respective third-party services listed in this document.

Given the objective complexity surrounding tracking technologies, Users are encouraged to contact the Owner should they wish to receive any further information on the use of such technologies by this Website.

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 this Website (or third-party services employed in this Website), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized 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 utilized 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 this Website 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 this Website. The Data Controller, unless otherwise specified, is the Owner of this Website.

This Website (or this Application)

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

Service

The service provided by this Website 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 statement has been prepared based on provisions of multiple legislations.

This privacy policy relates solely to this Website, if not stated otherwise within this document.

Latest update: July 12, 2023