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: Aurore Development s.p.a. – via A. Poerio 33 – 30013 Cavallino-Treporti (VE), Italia, P.IVA. 07250020968, tel 041/966110, privacy.contitolarita@auroredevelopment.it
	2. the person in charge of data security can be contacted at the following address dpo@auroredevelopment.it

ID	**3. Purpose of processing**	**Legal basis for processing (Ref. RE 2016/679)**
a)	Offers and bookings of accommodation services, additional and specific services required, 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 part and in order to fulfill 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 protection of the controller's legitimate interest in protecting its credit (Article 6(1)(f))
i)	Fraud prevention, including computer 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 is necessary for the performance of a contract to which the data subject is a part (allocation of parking spaces), for the protection of the data controller's legitimate interest in safeguarding property, access control, establishment of residence in the village or in the restaurants, identification of those present (Art. 6(1)(b), (c) and (f)).
l)	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,	Owner's legitimate interest (Art. 6(1)(f)).

Icone su Licenza CC BY Athlantic Srl - ttps://www.athlantic.it

	theft, robbery, damage or vandalism.	
m)	Sending of newsletters to present offers, promotions, and commercial opportunities of the Data 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 authorized night concierge 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 Ca' Pasquali Village and Vela Blu Camping Village.

6. Transmission of data

The data may be processed, for the purposes described in this notice, within the territory of the European Union. Should your data be transferred outside of the European Union, the Data Controller assesses the impact of data transfers and adopts, where applicable, the most appropriate safeguards (for example, adequacy decisions or standard contractual clauses or Binding Corporate Rules). Surveillance footage will be processed within 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 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 Villaggio Turistico Internazionale Srl, based in Bibione (VE), with which Aurore Development S.p.A. has a joint controllership agreement for the processing of data, in order to:
  a) best meet guests' accommodation requests
  b) carry out joint marketing activities, including the sending of newsletters;
  The essential contents of the joint controllership agreement are available at:
  https://www.auroredevelopment.it/Informazioni-sulla-contitolarita-IT-EN.pdf
- Company that provides the night porter service
- Company that supplies customer satisfaction questionnaires on our behalf
- Companies that perform maintenance work on our ICT services and equipment

Icone su Licenza CC BY Athlantic Srl - ttps://www.athlantic.it

- 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 expected.

The viewing of video surveillance image recordings is restricted to employers authorised 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, optional services and specific services.	Guests	10 years for tax and accounting obligations
	Offer of services (which do not become bookings).		Up to 24 months
3b)	Special data processing Art. 9 for the management of emergency escape procedures for guests with disabilities.	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 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 and 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	Revocation of consent (simply unsubscribe from the newsletter in each case by clicking on the relevant option). Unsubscription applies to both Joint Controllers.

Icone su Licenza CC BY Athlantic Srl - ttps://www.athlantic.it

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 suggest a complaint with a supervisory authority;

II. The controller shall provide a copy of the personal data being processed on 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 integration 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 illegally;
   c) the personal data must be erased in order to fulfill with a legal obligation under Union or Member State law to which the controller is subject.

Point IV does not apply so far 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 legality of the processing based on the consent given before the withdrawal.

The rights listed above can be exercised, vis-à-vis Villaggio Turistico Internazionale Srl and Aurore Development S.p.A., joint controllers of the data processing, by writing to the single point of contact indicated under "Data Controller".

Icone su Licenza CC BY Athlantic Srl - ttps://www.athlantic.it