

#### DATA PROTECTION AND INFORMATION SECURITY

We value your privacy and at Tenuta II Finale Sarl our services bring us into contact with personal information about you. This policy explains how we collect and use your data and how we adhere to the Data Protection Act 2018.

This document helps to ensure that we have followed the agreed company procedures, which regulate when and how your "personal data" may be obtained, used, disclosed and generally processed. It applies to computerised processing of personal data and paper- based files and records.

To comply with the law, information is collected and used fairly, stored securely and not disclosed to any other person unlawfully. To do this, Tenuta II Finale staff comply with the Data Protection principles and subsequent GDPR regulations. In summary, these state that personal data shall be:

- Processed fairly, lawfully and in a transparent manner
- Obtained for specified, explicit and legitimate purpose and not further processed
- Adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is deemed necessary for the specific purpose
- Processed in accordance with the data subject's rights
- Protected by appropriate security
- Not transferred to a third country or an international organisation if the provisions of the GDPR are not complied with (under the 8th principal we can transfer information for travel & event purposes to a third party overseas providing we have the individuals consent)

This privacy policy covers the following points:

- What kind of information do we collect; the ways we collect it and why
- How we use information we collect
- With whom we share information we collect
- How you can access, amend, and delete information we collect from you
- What kinds of security we use to protect information you provide.

Before using the Tenuta II Finale Sarl website or communicating with us – and particularly before providing personally identifiable information to us – you should read this entire policy. Use of our website or communicating with us constitutes your agreement to the terms of this policy. If the terms of this policy are not acceptable to you, do not provide any personally identifiable information to us. You can also contact us at: info@ tenutailfinale.com

### **HOW WE COLLECT INFORMATION**

We collect information from you in two ways: actively and passively. Active information collection refers to instances in which we gather information from you when you fill it in and send it to us, such as by completing a contact form on our website or signing up for an electronic publication. Active information includes both personally identifiable information (e.g., your full name) or information that is unique to you. Passive information collection refers to instances in which we collect information from you that you have not actively provided (please see the next section of this policy for a summary of our passive information collection methods).

### TYPES OF ACTIVE INFORMATION COLLECTION:

(a) Website Contact Form

If you wish to get in contact to find out more about our services, we ask you to complete a contact form that asks for the following information: full name, email address, company name, telephone number, job title and any optional details you wish to disclose about your enquiry.

(b) Sign up to electronic publications via our website

When you submit your request we ask for your email address.

(c) If you are attending a Tenuta II Finale Sarl event and are required to register via a registration site, we will ask for the following information: full name, email address, job title, company name, telephone number, dietary requirements. (For client registration sites, please ask for a copy of our full policy and refer to section called 'DATA PROCESSING ON BEHALF OF CLIENTS').

# TYPES OF PASSIVE INFORMATION COLLECTION:

Personal information will also be collected automatically via our website which we own and operate: www.tenutailfinale.com, as well as any online registration systems and websites we create for events:

# (a) Cookies and IP addresses

Our website is created using a third-party supplier called Wix. The development software uses several third-party tracking services that use cookies, IP addresses, location, browser and operating system data to track non-personally identifiable information about visitors to the Site in the aggregate like Google Analytics. We have no access or control of these third-party tracking utilities.

The site sometimes link the information we store in cookies to any Personally Identifiable Information you submit while on a Site in order to improve the Site and to deliver a better and more personalised service.

The Site uses both session ID cookies and persistent cookies. We use session cookies to make it easier for you to navigate a Site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

We set a persistent cookies also enable us to track and target the interests of our users to enhance the experience on our Site. You may refuse to accept cookies by activating the settings on your browser which allows you to refuse the setting of cookies. However, if you select this setting your ability to access certain areas of our Site may be limited. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site.

# (b) Personal data storage and security

Our company is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

# HOW WE COLLECT INFORMATION THROUGH OTHER CHANNELS

We collect information from you when you call us, when you send emails, when we meet with you in person and when you communicate with us via social media.





#### **HOW WE USE THE INFORMATION**

The data we process about you, will only be used and disclosed in accordance with this policy or as specifically disclosed to you at the time you provide the information.

We will process it in the following ways:

(a) To respond to your requests, it will be accessed by our internal staff, carefully selected third parties in the course of providing quotes that you request for our services.

(b) Should you opt in to receive our electronic and paper newsletters, company and services updates and relevant marketing news, or if you have previously asked us for a quote or confirmed a project with us. We will send you these to the email or postal address you have provided to us. You can unsubscribe any time – see section called 'Unsubscribing' for more information.

### **UNSUBSCRIBING**

On all our marketing communications to you we will include a clearly and prominently displayed way for you to unsubscribe from any future communications.

Should you wish to unsubscribe from marketing communications via email, you may opt out by sending an email to info@tenutailfinale.com writing 'unsubscribe' in the title or replying to a specific email campaign by replying to the email communication and writing 'unsubscribe' in the title.

Should you wish to unsubscribe from marketing communications via postal mail, you can contact us by e-mail at info@tenutailfinale.com please write "unsubscribe" in the subject line and provide each postal address you would like us to remove), or by post at Tenuta II Finale Sarl, 14 Strada Finale, Castagnole delle Lanze, Piemonte, Italy

### **ACCESS TO YOUR PERSONAL DATA**

We provide you with reasonable access to your personal information to correct errors or delete the information you have provided. If you wish to correct or delete your personally identifiable information, please contact us by e-mail at info@tenutailfinale.com or by post at Tenuta II Finale Sarl, 14 Strada Finale, Castagnole delle Lanze, Piemonte, Italy

#### **DATA PROTECTION OFFICER**

Tenuta II Finale Sarl has not appointed a data protection officer as it is our policy NOT to collect the following information:

Racial or ethnic origin or political opinions

Religious or philosophical beliefs

Trade union membership

Genetic data, or biometric data,

Data concerning health

Data concerning a natural person's sex life or sexual orientation.

We have a Data Protection Manager who can be contacted at:

### TENUTA IL FINALE SARL

14 Strada Finale, Castagnole delle Lanze, Piemonte, Italy

E: info@tenutailfinale.com

This policy was last updated in June 2024