

## **Privacy policy (articles 13 and 14 of EU Regulation 2016/679 GDPR)**

Dear User,

Within the meaning of the articles 13 and 14 of the EU Regulation 2016/679, we inform you that your personal information will be processed in an ethical and transparent manner, for lawful purposes only, and in order to safeguard your privacy and your rights.

### **1. Data Controller**

The Data Controller is **Amministrazione Provinciale di Sondrio**, based in Sondrio (SO), Corso XXV Aprile 22 (Tax Code: 80002950147 – VAT number: 00603930140), in the person of its *pro-tempore* legal representative.

### **2. Data Processor**

The Data Processor responsible for managing the contents of the [www.valtellina.it](http://www.valtellina.it) portal and institutional web communication channels is **Valtellina Turismo Società Cooperativa Consortile**, based in Sondrio, via Piazzzi 23 (Tax Code: 00940230147), in the person of its *pro-tempore* legal representative.

### **3. Data Protection Officer**

In compliance with article 37 of the Regulation (EU) 2016/679, the Controller nominated Dr. Massimo Castelli as Data Protection Officer, contactable at the following email address [dpo@provinciasondrio.gov.it](mailto:dpo@provinciasondrio.gov.it).

### **4. Data Collection**

The types of personal data that we collect include "common" personal data such as name, surname and e-mail address.

### **5. Processing Purposes**

We use your personal data for the following purposes:

- To send you newsletters and communications relating to marketing and promotion of Valtellina tourism offer;
- Processing is necessary for compliance with a legal obligation to which the Controller is subject;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

### **6. Legal basis of processing and data provision**

The legal basis that justify data processing are:

- The data subject has given consent to the processing of his or her personal data (art. 6, lett. a, of the EU Regulations n. 679, 2016);
- Processing is necessary for compliance with a legal obligation to which the controller is subject (art. 6, lett. c, of the EU Regulations n. 679, 2016);
- The legitimate interests pursued by the Data Controller or by a third party (art. 6, lett. f, of the EU Regulations n. 679, 2016).

All Data requested by this website are optional; however, the failure to provide them may make it impossible to pursue the processing purposes indicated above.

### **7. Processing methods**

Processing takes place manually and using IT tools in order to guarantee the confidentiality of the data provided and minimizing the risk of unauthorized access, theft or tampering with the data, in compliance with the provisions of art. 32 of the EU Regulation 2016/679 GDPR and in compliance with the provisions of art. 29 of the same regulation.

### **8. Data Sharing**

For the purposes indicated in point 5, the data may be communicated to third parties to comply with legal obligations, regulations, community regulations or aspects concerning the management and performance of the contract.

The data provided may also be communicated to:

- Providers involved to optimize the activities of Data Controller and Data Processor (eg. providers of back-up of data services, e-mail, network monitoring, web site maintenance, etc.);
- External consultants (other professionals), banking institutes, etc.;
- Competent authorities: We disclose personal data to law enforcement and other governmental authorities insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud, and in order to assure defense before the courts; in these cases the legal basis is the legitimate interests pursued by the controller (art. 6, lett. f, of the EU Regulations n. 679, 2016);

Entities, who carry out the types of activities referred above, will use the information as processor according to art. 28 of the EU Regulations n. 679, 2016. The procedures aimed at guaranteeing the integrity, confidentiality and availability of personal data naturally remain. Personal data will not be subject to disclosure.

### **9. International Data Transfers**

The transmission of personal data as described in this Privacy Statement is limited to countries belonging to the European Union, with express prohibition to transfer them to extra EU countries that does not guarantee an adequate level of protection.

### **10. Data retention period**

In compliance with the principles of lawfulness, limitation of purposes and minimization of data (art. 5 of the EU Regulations n. 679, 2016), we keep personal data in a form which permits identification of data subjects for as long as required by law.

When processing is based on the user's consent, your information will be retained for a maximum of 24 months and will be not disclosed outside the company. You can revoke your consent at any time.  
At the end of the retention period, personal data will be deleted.

#### **11. Your choices and rights**

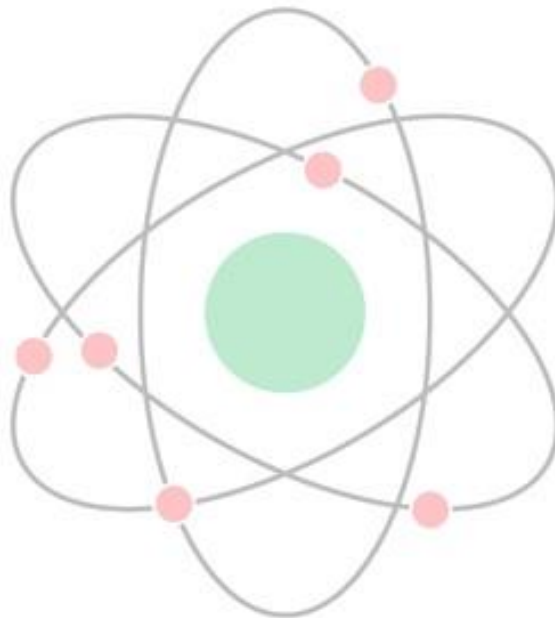
We also would like to inform you that the European Regulation grant you certain rights, including rights of access to, adjustment, erasure, limitation of, or objection to the processing of your data, as well as data portability rights, when and insofar as applicable (Articles 15-22 of the EU Regulations n. 679, 2016). You can also file a complaint with the Data Protection Authority, according to the procedures set forth under applicable regulations (art. 77 of the EU Regulations n. 679, 2016).

For any other concern, and to assert your rights under the EU Regulation, you may send a registered letter to the following address: Valtellina Turismo Società Cooperativa Consortile, Via Piazzzi 23, 23100 – Sondrio (SO), or a certified e-mail to: [valtellinatourismo@legalmail.it](mailto:valtellinatourismo@legalmail.it)

#### **12. Cancellation of the service**

To stop receiving newsletters, you may send an email to [info@valtellinatourism.it](mailto:info@valtellinatourism.it) or click the unsubscribe link in the footer of each message received.

In case of technical problems, it is possible to send an e-mail report to: [info@valtellinatourism.it](mailto:info@valtellinatourism.it)



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