Privacy Policy

Data Subjects: Visitors to the website hotelsaligari.it.

Data Controller

The Data Controller, pursuant to the law, is **A.W.U. SRL** (Via Mario Copes, 397, 23020 Verceia (SO), VAT No. 01087130140), which can be contacted at the following details: e-mail info@hotelsaligari.com, telephone +39 034339100, in the person of its legal representative pro tempore.

A.W.U. SRL, as Controller of the processing of your personal data, pursuant to and for the purposes of EU Regulation 2016/679 (hereinafter "GDPR"), hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data, and that such processing will be based on the principles of fairness, lawfulness and transparency and on the protection of your privacy and your rights.

Your personal data will be processed in accordance with the provisions of the above-mentioned legislation and with the confidentiality obligations set out therein.

Purposes, legal basis and retention periods

Your data will be used for the following purposes:

- Necessary browsing data:

  The IT systems and software procedures used to operate this website acquire, in the course of their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols.

  This category of data includes the IP addresses or domain names of the computers and devices used by users, the URI/URL (Uniform Resource Identifier/Locator) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server's response (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.
  Such data, which are necessary for the use of the web services, are processed for the purpose of checking that the services offered are functioning correctly.

  Browsing data and technical data will be processed and stored for the time strictly necessary to ensure the correct functioning of the website, the security of the systems, the provision of the requested services and compliance with any legal obligations or requests from the competent authorities.
  More specific retention periods, where applicable, are set out in detail in the Cookie Policy.

- Statistical browsing data and cookies:

Subject to the user's consent, the website may use cookies and similar technologies to obtain statistical information on the use of the services, such as the most visited pages, the number of visitors by time slot or by day, and the geographical areas they come from. For further details on the types of cookies used, their purposes and how consent is managed, please refer to the Cookie Policy available in the website footer.

- Personal data voluntarily provided by the user:

Personal data provided by filling in the forms on the website will be processed for the purposes set out below.

1. **Contact and information requests:**
   The personal data provided by the user, such as first name, surname, e-mail address and telephone number, will be processed solely to respond to the request for information submitted by the data subject. Such data will be stored for the time strictly necessary to provide the requested service.
2. **Booking:**
   Personal data voluntarily provided by the user to book a room (first name, surname, country, e-mail, telephone) will be processed solely for the purpose of handling the data subject's booking. The booking service is not managed directly by the Data Controller but is handled through the Scidoo management software, which acts as Data Processor.

If the user ticks the box consenting to subscribe to the newsletter in the dedicated form, the personal data provided may also be processed for sending informational, promotional and marketing communications by newsletter.
In the latter case, the legal basis for the processing is the explicit consent of the data subject, given by ticking the relevant box before submitting the form. Personal data provided for the newsletter subscription will be stored until the data subject withdraws their consent.

What tracking pixels are and how they work
E-mail communications sent by **A.W.U SRL**, regardless of how the service is accessed (webmail, e-mail client, mobile app, etc.) and of the device used, may contain technical markers known as "tracking pixels". These are snippets of code or electronic images embedded in the e-mail message: when the recipient opens the message, the tool records the opening event and interacts with the user's device.

1. **Types of data collected:**
   Depending on the nature of the communication and the choices expressed by the Data Subject, the activation of the tracking pixel may involve individual measurement and an analysis of the open/click rate of the links included in the e-mail communications sent.
2. **Purposes of processing and legal bases (Art. 122 of the Italian Privacy Code and Art. 6 GDPR)**
   Processing by means of tracking pixels is carried out in strict compliance with Art. 122 of Legislative Decree 196/2003 (Italian Privacy Code) and with Decision no.

284 of 17 April 2026 of the Italian Data Protection Authority (Garante per la protezione dei dati personali); the use of such tracking pixels is considered to fall within the statutory exemption, as it serves to provide you, as a recipient of the communications sent by **A.W.U SRL**, with a more effective and efficient service for your benefit, as well as to ensure the correct delivery of communications due under existing contractual relationships and/or by law.

3. **Commercial and promotional communications, newsletters and satisfaction surveys (processing based on consent pursuant to Art. 122(1) of the Italian Privacy Code and Art. 6(1)(a) GDPR):**
   In communications for marketing purposes, newsletters, commercial offers, automated promotional communications or commercial surveys, tracking pixels are used for individual measurement and to analyse the open/click rate of the links included in the e-mail communications sent, and thus to optimise mailings and tailor their content and frequency, including on the basis of the interests and preferences attributable to the e-mail recipient.
4. **Nature of the provision of data and granular withdrawal of consent (Art. 7(3) GDPR)**
   Consent to tracking pixels in promotional communications may be given, when subscribing or updating preferences, together with the general consent to receive promotional communications (by means of a single informed expression of will). Giving consent is optional: failure to give it, or its subsequent withdrawal, does not entail any limitation on the use of the contractual services requested. A Data Subject who has given consent has the right to withdraw it at any time, as easily as it was given, including on a granular (partial) basis, by choosing between two options:
   - Partial withdrawal (tracking pixels only): disabling only the individual tracking of e-mail opening, while continuing to receive promotional communications and newsletters without personalised tracking pixels as normal;
   - Full withdrawal: withdrawing consent to promotional communications entirely, stopping any future sending of marketing messages.
5. **Categories of recipients**
   Data collected through tracking pixels are processed by personnel authorised by the Data Controller and by third-party technology service providers, specifically appointed as Data Processors pursuant to Art. 28 GDPR.

Categories of recipients of the personal data processed

Your data will be processed only by personnel expressly authorised by the Data Controller and, in particular, by the following categories of authorised personnel:

1. Internal staff responsible for managing the website.
2. Any technical staff tasked with examining and responding to the information requests submitted by the user.
3. Where consent is given by ticking the relevant box for the newsletter subscription, the data may also be processed through dedicated software or platforms for managing and sending newsletters.

Disclosure

For the proper management of the relationship, your data may be disclosed to external parties duly appointed as Data Processors, including web service providers responsible for managing and maintaining the platform.

Dissemination

Your personal data will not be disseminated in any way.

Transfer of data to third countries

Your personal data may also be transferred, solely for the purposes set out above, to the following countries:

- EU countries;
- United States.

Should it become necessary to transfer data subjects' personal data to countries located outside the EEA, this will take place in compliance with the limits and conditions set out in Articles 44 et seq. of EU Regulation 2016/679.

Processing methods

The processing of Personal Data described above will be carried out by the Data Controller using automated or manual methods.

Rights of the data subject – EU Regulation 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them exist, even if not yet recorded, to have such data communicated in intelligible form, and to lodge a complaint with the supervisory authority.
2. The data subject has the right to be informed of:
    - the source of the personal data;
    - the purposes and methods of the processing;
    - the logic applied in the case of processing carried out with the aid of electronic means;
    - the identification details of the controller, the processors and the representative designated pursuant to Article 5(2);
    - the parties or categories of parties to whom the personal data may be disclosed or who may become aware of them in their capacity as designated representative in the territory of the State, processors or persons in charge of processing.

3. The data subject has the right to obtain:
    - the updating, rectification or, where they have an interest therein, the integration of the data;
    - the erasure, anonymisation or blocking of data processed unlawfully, including data whose retention is not necessary for the purposes for which they were collected or subsequently processed;
    - certification that the operations referred to in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been disclosed or disseminated, except where this proves impossible or involves a manifestly disproportionate effort compared with the right protected;
    - data portability.
4. The data subject has the right to object, in whole or in part:
    - on legitimate grounds, to the processing of personal data concerning them, even if relevant to the purpose of collection;
    - to the processing of personal data concerning them for the purpose of sending advertising material or direct selling, or for carrying out market research or commercial communication.

Changes to this Privacy Policy

The Data Controller may change, modify, add or remove any part of this Privacy Policy.