

## PRIVACY POLICY

### Information on personal data processing

Information notice pursuant to Art. 13 of Reg. (EU) no. 2016/679.

Data Controller

Bogogno Golf Club Srl , in the person of its pro tempore legal representative

Purposes of data processing, legal grounds and data retention period

Purposes of data processing	Legal grounds	Data retention period
Browsing this website	Legitimate interest   Rights of the data subject  Activities strictly required for website operation and performance of the browsing service on the relevant platform.	Until the end of the browsing session
Submitting a contact or information enquiry	Legitimate interest   Data subject's request	1 year
Management, administration, financial and accounting activities as well as customer/ user data management, regardless of the scope of the data being processed. Specifically, the aforesaid purposes are served by all internal management activities.	Legitimate interest and fulfilment of contract obligations	10 years Art. 2220 of the Italian Civil Code Accounting data
For direct marketing activities performed by the Data Controller, newsletters, market surveys or any other sample surveys and direct sales, in order to receive information literature via automated e-mail, facsimile, MMS (Multimedia Messaging Service) or SMS (Short Message Service) text messages or any other type of texts, as well as by operator phone calls and regular mail, in order for the Data Controller to assess customer satisfaction or disseminate promotional materials, marketing and advertising materials or information on events and initiatives.	Consent	Until opt-out   unsubscribing from mailing list

### Data provision

With the exception of the provisions concerning browsing data, users are free to provide their personal data. The provision of personal data is optional or required according to the specific purposes for processing the said data. Failure to provide the personal data marked by a star symbol (\*) or the wording (required) may result in the impossibility to receive a response to a request or make use of the services provided by the Data Controller.

### Recipients

In order to fulfil the existing contract obligations or related purposes, your personal data will be processed by companies having existing agreements with Bogogno Golf Club Srl and may also be disclosed to the following third parties: - Entities that provide services for the management of the information system used by Bogogno Golf Club Srl and telecommunications networks; - Professionals, firms or companies within the scope of their support and advisory services; - entities providing support services to the performance of the above-mentioned activities included in the purposes of data processing (entities dealing with communication, printing of catalogues, advertising materials and leaflets, Website and video production); - Hosting providers for the above-mentioned services (e.g., web hosting);

- Business partners, only with prior consent; - Competent authorities for the enforcement of law provisions and/or regulations imposed by public bodies, upon request; - other FEDERGOLF and GESGOLF members.

The entities falling within the above-mentioned categories shall act as Data Processor or may perform their tasks fully independently, as separate Data Controllers. Your data will be disclosed if, upon subscribing as a member, you gave your consent for the disclosure of your personal data by publishing the said data on Bogogno Golf Club Srl's official Web site. Any further communication or disclosure shall only occur with your prior explicit consent.

Data transfer to other countries and/or International entities.

The personal data being provided will not be transferred abroad to countries within the European Union as well as non-EU countries. Should this occur data transfer shall be performed under the conditions and within the limits imposed by Articles 44 and foll. of EU Regulation no. 2016/679, in order to fulfil the requirements arising from the purposes of the said data transfer.

The data subject may be given a copy of the conditions for the data transfer by applying to the Administrative Office.

#### Rights of the data subject | Complaint to supervisory authority

You can exercise your rights pursuant to Articles 15, 16, 17, 18, 19, 20, 21, 22 of EU Regulation no. 2016/679 by contacting the Data Controller. To do so, you can phone us at 0322-864137 or send an e-mail to [info@bogognogolfresort.com](mailto:info@bogognogolfresort.com). You are at all times entitled to ask the Data Controller for access to your personal data or request that your personal data be amended or deleted, or their processing be limited. Furthermore, within the scope of the cases provided for by law, you are entitled to oppose your personal data processing (including automated processing, such as profiling) at any time, or withdraw your consent without affecting the lawfulness of data processing based on your consent before its withdrawal.

Without prejudice to any other administrative or judicial redress, if you believe that your personal data processing is in breach of the provisions set forth in EU Reg. no. 2016/679, pursuant to Art. 15 para. f) of the aforesaid EU Reg. no. 2016/679, you shall have the right to lodge a complaint with the supervisory authority for personal data protection and, with reference to Art. 6 para. 1, item a) (consent) and Art. 9, para. 2, item a) (consent to specified purpose for special categories of personal data), withdraw your consent at any time.

Within the scope of the cases provided for by law, you shall be entitled to data portability. In this case the Data Controller shall provide you with your data in a structured, commonly used format, readable from any electronic device.

#### Amendments to Privacy Policy

The Data Controller reserves the right to amend, update, add or remove sections of the current information notice on Privacy Policy at their discretion and at any time. In order to make it easier for you to monitor amendments the information notice will include the date of the latest update.

Updated on: 19/09/2018