

# Privacy policy

Tenuta di Castelfalfi S.p.A. and, where it acts as Joint Data Controller for the data processing of this Site, TDC Agricoltura Società Agricola a r.l. inform you, pursuant to art. 13 of EU Regulation No. 679 dated 27 April 2016 the "General Data Protection Regulation" (hereinafter "Regulation"), that the personal data you provide by browsing or filling in specific forms will be processed in the manner and for the purposes indicated below.

For more information on the existing agreement between the two joint data controllers see below.

## Navigation data

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

This information is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This category of data includes the IP addresses or domain names of the computers used by users connecting to the site, the URI (Uniform Resource Identifier) addresses of the resources requested, 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 response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and computer environment.

This data is only used to obtain anonymous statistical information on the use of the site and to check its correct operation and is deleted immediately after processing. The data may be used to ascertain liability in the event of computer crimes against the site.

## Data provided voluntarily by the user

Purpose of the processing	Type of data processed	Legal basis and nature of the assignment	Storage time	Data controller
<b>BOOKING HOTELS, VILLAS AND APARTMENTS</b> Your personal data will be used to define and confirm your reservation at our premises. Various activities associated with this purpose are possible, such as: facilitating your accommodation and lodging, providing you with additional services requested by you and offered by our premises, handling any requests or special needs you may have, processing payments, handling legal obligations, and more.	The data to be processed are: personal and contact data, payment data as well as any other information you may voluntarily provide in the forms.	The legal basis for the processing is the execution of a contract to which you are a party or the implementation of pre-contractual measures taken at your request.  The provision of personal data is necessary to handle your request, failure to provide them will result in our staff being unable to complete the booking process.	The data will be processed for the time necessary to process the request and stored whenever required by law for the term provided for by the legislation.	<b>Tenuta di Castelfalfi S.p.A.</b>
<b>NEWSLETTER</b> Your personal data will be processed to send you information and promotional material regarding the activities of Tenuta di Castelfalfi and TDC Agricoltura through our newsletter service. In addition to the general newsletter, specific newsletters will be sent concerning the activities of the Estate and TDC Agricoltura in which you have expressed an interest.	Your personal data, contact data, and your preferences regarding the activities of the Joint Data Controllers, provided while browsing the website, will be processed.	The legal basis for the processing is the consent you provide and the provision of personal data is optional. In the event that you give your consent to receive information and promotional material via the newsletter service, please note that you have the right to withdraw it at any time and with the same ease with which it was previously granted.	Your data will be stored until you revoke your consent.	<b>Tenuta di Castelfalfi S.p.A. and TDC Agricoltura Società Agricola a r.l., as Joint Data Controllers</b>
<b>CONTACT FORM</b> The personal data you voluntarily enter in the Contact form will be processed exclusively for the purpose of providing you with the requested information and responding to your communication.	The data to be processed are: personal and contact data, as well as any other information you may voluntarily provide in the form.	The legal basis for the processing is the execution of a contract to which you are a party or the implementation of pre-contractual measures taken at your request as well as the legitimate interest of the Contractors to handle requests and process any complaints.  The provision of personal data is necessary to obtain the information requested. Failure to provide them will make it impossible for our staff to respond to your requests.	The data will be processed for the time necessary to process the request and stored whenever required by law for the term provided for by the legislation.	<b>Tenuta di Castelfalfi S.p.A. and TDC Agricoltura Società Agricola a r.l., as Joint Data Controllers</b>
<b>WORK WITH US</b> The data will be processed for purposes related and instrumental to the performance of personnel selection activities, including the assessment of your application, the review of your qualifications, experience and skills and the result of your interview.  The candidate is not asked to provide any special data, with the sole exception of any data that may be required to assess the existence of the requirements for granting any benefits and/or contributions provided for by law, as well as the existence of the necessary conditions for the application of particular regulations on tax, trade union, health and public order protection, occupational safety and, in general, other regulations on labour law.	Common personal data (personal details, contact details, educational qualifications, work experience, etc.). Particular data.	The legal basis of the processing is the execution of a contract to which you are a party or the implementation of pre-contractual measures taken at your request.  Any processing of special data is necessary for the purposes of fulfilling the obligations and exercising the specific rights of the data controller or the data subject in the field of labour and social security law and social protection.  The provision of data is necessary in order to participate in a possible selection procedure.	The data will be processed for the time necessary to carry out the selection process and in any case for no longer than 12 months.	<b>Tenuta di Castelfalfi S.p.A. and TDC Agricoltura Società Agricola a r.l., as Joint Data Controllers</b>
<b>GOLF CONTACT FORM</b> The personal data you voluntarily enter in the form will be used exclusively to provide you with the requested information about the Castelfalfi Golf Club.	The data to be processed are: your personal and contact data, as well as the information you have selected from those available on the form.	The legal basis for the processing is the execution of a contract to which you are a party or the implementation of pre-contractual measures taken at your request as well as the legitimate interest of the data controller to handle requests and process any claims.  The provision of personal data is necessary to obtain the information requested. Failure to provide them will make it impossible for our staff to respond to your requests.	The data will be processed for the time necessary to process the request and stored whenever required by law for the term provided for by the legislation.	Depending on the request made, the Data Controller may be:  <b>Tenuta di Castelfalfi S.p.A.</b>  For information on rates, field bookings and, in general, services or events promoted by the Estate or  <b>Golf Club Castelfalfi ASD</b>  For information about the association, the Italian Golf

## Recipients of the personal data

The personal data you provide will be processed by appointed personnel, appropriately trained and operating under the authority and responsibility of the subjects listed below and operating, depending on the data processing, as Data Controllers or Joint Data Controllers.

Your personal data may also be processed by companies that are part of the group, by third parties that provide instrumental services, including communication services, email, delivery of correspondence, technical services for the management of the Site, suppliers of IT services or, depending on the request, to suppliers of services related to the nature of the claim or suggestion.

Only the data strictly necessary to perform the related functions will be disclosed to the above-mentioned subjects. Such communications, when made outside the European Union, are made in compliance with the guarantees provided by the legislation on the protection of personal data and ensuring adequate protection to the data subject, through the signing of appropriate agreements (standard contractual clauses, Binding Corporate Rules, etc.).

An up-to-date list of all recipients will be provided on request by writing to the following e-mail address [privacy@castelfalfi.com](mailto:privacy@castelfalfi.com)

## Rights of the data subjects

We would also like to inform you that you can exercise your rights under Chapter III of the Regulation at any time with regard to said data. In particular, you have the right to request access to the data concerning you, their rectification or erasure, the integration of incomplete data, the limitation of their processing; to receive the data in a structured, commonly used and machine-readable format; to revoke your consent and to object in whole or in part to the use of the data; as well as to exercise the other rights granted to you by the applicable regulations.

These rights may be exercised by writing to the above address or by e-mail to the following e-mail address [privacy@castelfalfi.com](mailto:privacy@castelfalfi.com)

In addition, pursuant to Article 77 of the Regulation, you have the right to lodge a complaint with the Data Protection Authority if you believe that the processing violates the Regulation

## Contact details of the Data Controllers and the Data Protection Officer

Tenuta di Castelfalfi S.p.A. registered office - Località Castelfalfi, 50050 Montaione (FI). E-mail - [info@castelfalfi.com](mailto:info@castelfalfi.com)

The Data Protection Officer can be contacted at the following e-mail address [privacy@castelfalfi.com](mailto:privacy@castelfalfi.com)

TDC Agricoltura Società Agricola a r.l. registered office - Località Castelfalfi, 50050 Montaione (FI). E-mail - [info@castelfalfi.com](mailto:info@castelfalfi.com)

The Data Protection Officer can be contacted at the following e-mail address [privacy@castelfalfi.com](mailto:privacy@castelfalfi.com)

Golf Club Castelfalfi ASD (Golf Club Castelfalfi Associazione Sportiva Dilettantistica) registered office - Località Castelfalfi, 50050 Montaione (FI), at the offices of Tenuta di Castelfalfi S.p.A. E-mail - [golf@castelfalfi.com](mailto:golf@castelfalfi.com)

## Joint Data Controller agreements - Essential Content of the Agreement

Tenuta di Castelfalfi S.p.A. and TDC Agricoltura Società Agricola a r.l., although formally different legal entities, are entities that are part of a single entrepreneurial project that aims to offer luxury products and comprehensive services and make the most of the advantages of the village and nature in which Tenuta and Agricola are immersed. Therefore, the two companies have decided to develop marketing and image promotion activities together. In particular, the processing operations relating to the website and the newsletter service are managed jointly.

To this end, the aforementioned companies have entered into an agreement to regulate the co-ownership relationship pursuant to Article 26 of EU Regulation 679/2016 (GDPR), concerning the processing of personal data carried out jointly.

The contact of reference for the data subjects is Tenuta di Castelfalfi S.p.A., which has the organisational and structural capacity to deal with requests to exercise rights.

The Parties jointly have the obligation to inform the data subjects, at the time of collecting their personal data or at the latest at the time of first contact, of the manner and purpose of the processing of personal data by providing them with adequate information.

