

Privacy policy on the processing of personal data. Effective as of 08/01/2025

INTRODUCTION

The relationship with the user is regulated according to what is provided by the Swiss Federal Law on Data Protection (LPD) of September 25, 2020. More favorable rights provided by the user's national law are preserved. In particular, for users who are in a country belonging to the European Union, the rights provided by the Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 (GDPR) apply. Users residing outside Switzerland are informed that this country has received an Adequacy Decision from the European Commission on January 15, 2024. Therefore, the transfer of personal data to Switzerland can be carried out without the need to obtain authorizations from the competent Privacy Authority.

Data Controller: Caletta91 S.r.l, Via del forte Trionfale 5 00135 Roma - VAT 04090561004

Site to which this privacy policy refers: <https://www.exclusiveluxuryresortsardinia.com> (**Site**).

The Data Controller has not appointed a DPO. Therefore, you may send any inquiries directly to the Data Controller.

GENERAL INFORMATION

This document describes how the Data Controller processes your personal data.

The following describes the main processing of your personal data. In particular, we explain the legal basis of the processing, whether the provision of personal data is compulsory and the consequences of not providing personal data. To better describe your rights, if necessary, we have specified if and when a certain processing of personal data is not carried out. On the Site you have the possibility to enter personal data of third parties. In this case you guarantee to have obtained the consent of these subjects to the insertion of these personal data. Therefore, you agree to indemnify and hold harmless the Data Controller from any liability.

Site registration

The Site does not offer the possibility of registration. Therefore, the Data Controller does not process your personal data for this purpose.

Purchases on the Site

It is not possible to make purchases on the Site. Therefore, your personal data will not be processed for this purpose. The Data Controller does not process the user's data to send "reminder" emails to purchase products and/or services from the Data Controller.

Answering your requests

Your data will be processed to respond to your requests for information. The conferment is optional, but your refusal will make it impossible for the Data Controller to answer your questions. The legal basis for the processing is the legitimate interest of the Data Controller in fulfilling your requests.

This legitimate interest is equivalent to the user's interest in receiving a response to communications sent to the Data Controller.

Marketing

Subject to your consent, the Data Controller may process the personal data provided by you in order to send you advertising material and/or newsletters relating to its own products or those of third parties. The legal basis of this treatment is your consent. The provision of personal data for this purpose is purely optional. Failure to consent to the processing of data for marketing purposes will make it impossible for you to receive advertising material relating to products/services of the Data Controller and/or third parties, as well as making it impossible for the Data Controller to carry out market surveys, also aimed at assessing the degree of user satisfaction, and to send you newsletters. These communications will be sent to your e-mail and/or telephone number (in this last case also through SMS and/or WhatsApp). We use Google services, such as Google Ads and Google Analytics, to personalize advertisements and enhance user experience. This includes the collection of personal data and cookies, used to show you ads that match your preferences. Upon consent, you will be asked to authorize the use of this data. More details on cookie usage and consent management can be found in this website's cookie policy.

Profiling

Subject to your consent, the Data Controller may process your personal data for profiling purposes, i.e. for the analysis of your consumption choices by revealing the type and frequency of purchases made by you, in order to send you advertising material and/or newsletters relating to its own products or third parties, of your specific interest. The legal basis of this treatment is your consent. The provision of data for this purpose is purely optional. Failure to consent to the processing of your personal data for profiling purposes will make it impossible for the Data Controller to elaborate your commercial profile, through the detection of your choices and buying habits and to send you advertising material about products of the Data Controller and/or third parties, of your specific interest. These communications will be sent to your e-mail and/or telephone number (in this last case also through SMS and/or WhatsApp).

Data transfer

The Data Controller does not transfer your personal data to third parties.

Geolocalization

The Site does not implement tools to geolocate the user's IP address.

Curriculum Vitae

It is not possible to send CVs via the Website. Your data will therefore not be processed for these purposes.

Booking Service

There are no third-party appointment booking systems active on the Site. Therefore, your data will not be processed for this purpose. In any case, you can always contact the Data Controller at the contacts indicated in the heading.

Fotografie e video

The Data Controller does not request the publication of photographs and/or videos of you. Therefore, your data will not be processed for these purposes.

Web scraping

The Data Controller allows the use of web scraping techniques, provided that such activities are carried out in compliance with the following terms and conditions: (i) Legal and Ethical Access. Web scraping must be carried out in a legal and ethical manner. Users must comply with all applicable laws and regulations when performing scraping activities; (ii) Responsible Use. Users must ensure that scraping techniques do not compromise the functionality of our website, overload the Site's servers or interfere with other users' experience; (iii) Respect for Personal Data. Users must respect the privacy and protection of personal data on the Site. Any collection of personal data must be done in accordance with applicable data protection legislation; (iv) Attribution. It is required that any data or content collected from the Site through web scraping is properly attributed to the Site as the original source; (v) Limitations. The Data Controller reserves the right to impose limitations or restrictions on web scraping, including requiring prior written agreement in certain cases. Users must be prepared to stop scraping activities at the request of the Data Controller. By using the Site and carrying out web scraping activities, you agree to comply with the above terms and conditions. Failure to comply with these terms and conditions may result in the revocation of your permission to carry out web scraping and the adoption of appropriate measures to protect the rights and interests of the Data Controller.

Communication of personal data

As part of its ordinary business, the Data Controller may communicate your personal data to certain categories of subjects. In article 2 you can find the list of subjects to which the Data Controller communicates your personal data. In order to facilitate the protection of your rights, Article 2 may specify in certain cases when your data is not communicated to third parties.

The "communication" of personal data to third parties is different from the "transfer" (governed by the preceding point). In fact, in the communication the third party to whom the data is transmitted can use it only for the specific purposes described in the relationship with the Data Controller. In the transfer, instead, the third party becomes the autonomous Data Controller. Moreover, to transfer your personal data to third parties is always required your consent.

Without prejudice to the foregoing, it is understood that the Data Controller may still use your personal data in order to correctly fulfill the obligations provided for by the laws in force.

PRIVACY POLICY

Art. 1 Method of processing

1. The processing of your personal data will be mainly carried out with the help of electronic or automated means, according to the methods and with the tools suitable to ensure their security and confidentiality.
2. The information acquired and the methods of treatment will be relevant and not excessive in relation to the type of services rendered. Your data will also be managed and protected in secure computer environments appropriate to the circumstances.
3. Through the Site are not processed "special data". Particular data are those that can reveal racial and ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade union, health and sex life.
4. No judicial data is processed through the Site.

Art. 2 Communication of personal data

The Data Controller may communicate your personal data to certain categories of subjects. The Data Controller wishes to inform users that, in the context of using the YouTube service (managed and owned by Google LLC), some personal data may be collected and shared. This data collection is essential to provide and enhance the user experience on our Site and to enable viewing of video content integrated through the YouTube API. In detail, when a user views a video content through the YouTube API on our Site, the following information may be collected: IP Address: Used to connect the user's device to YouTube for video transmission. Behavioral Data: Includes information on how the user interacts with videos, such as which videos are viewed and for how long. Location Information: Used to provide relevant content based on the user's geographical location. These data are automatically collected by the system and, in some cases, may be stored to improve user experience and for internal analytical purposes at YouTube. It is specified that our Site uses YouTube's API services and, by viewing content through these APIs, the user accepts YouTube's Terms of Service available at <https://www.youtube.com/t/terms>. For further details on data management by Google LLC, users are invited to consult Google LLC's privacy policy at <http://www.google.com/policies/privacy> and YouTube's at https://www.youtube.com/intl/ALL_it/howyoutubeworks/our-commitments/protecting-user-data/. Details on the use of User API Data User API Data: When a user interacts with YouTube videos embedded in our Site, data such as viewing preferences, video viewing history, and interactions with video content (likes, comments, shares) may be collected. These data are made available through the YouTube API and help to understand how users interact with video content. Access to data via the Client API: Our Site may use specific API calls to request and receive data from YouTube. This may occur when a user views a video, with the system automatically recording relevant information. Data Collection: Data are automatically collected by the YouTube system when users interact with YouTube videos on our Site. This process is essential to provide a smooth and personalized user experience. Data Storage: The collected data are securely stored in YouTube's systems for a period that does not exceed the necessity of use. YouTube adopts all necessary security measures to protect these data from unauthorized access or illicit uses. Use of Data: YouTube uses these data for various purposes, including: Internal Analysis: To better understand user interactions with video content and improve the quality of YouTube services. Content Personalization: To offer users a more personalized experience, based on their preferences and interaction history. User Experience Improvement: To identify and resolve any technical issues and optimize the usability of video content. The subjects to whom the Data Controller reserves the right to communicate your data are indicated below:

- The Data Controller may communicate your personal data to all those subjects (including Public Authorities) who have access to personal data by virtue of regulatory or administrative measures.
- Your personal data may also be disclosed to all those public and / or private individuals and / or legal entities (legal, administrative and tax, judicial offices, Chambers of Commerce, Chambers and Offices of Labor, etc.), if the communication is necessary or functional to the proper fulfillment of obligations under the law.
- The Data Controller uses employees and/or collaborators in any capacity. For the proper functioning of the Site, the Data Controller may communicate your personal data to these employees and/or collaborators.
- The Data Controller does not use companies, consultants or professionals in charge of the installation, maintenance, updating and, in general, the management of the Data Controller's hardware and software. Therefore, your data will not be communicated to these categories of subjects.
- In order to send its communications, the Data Controller uses external companies in charge of sending this type of communication (CRM platforms). Your personal data (in particular your email) may therefore be communicated to these companies.
- The Data Controller does not use external companies to provide customer care services. Therefore, your personal data will not be processed for this purpose.

- The Data Controller does not utilize banking institutions and companies that manage payment networks.
- The purchaser's personal data may be communicated to post offices, couriers or forwarding agents responsible for the delivery of the Products purchased through the Site.

The Data Controller reserves the right to modify the above list in accordance with its ordinary operations. Therefore, you are invited to regularly access this information to check to which subjects the Data Controller communicates your personal data.

Art. 3 Personal data retention

3.1 This article describes how long the Data Controller reserves the right to retain your personal data.

3.2 For marketing purposes, personal data will be kept until consent is revoked. For inactive users, personal data will be deleted after one year from the sending of the last email eventually viewed.

3.3 For the purpose of executing the sales contract, the data will be kept for 10 years from the date of receipt of the purchase order. This is to allow the Data Controller to exercise its right of defence and to prove the Seller has performed its duties.

3.4 As provided for in Article 2220 of the Civil Code, invoices, as well as all accounting records in general, are kept for a minimum period of ten years from the date of registration, so that they can be presented in the event of an audit.

3.5 Through the Website (or by requesting it from the Data Controller), it is possible to delete the user's account. In this case, all stored personal data will be deleted and will not be retained by the Data Controller for any purpose.

3.6 Without prejudice to the provisions of Article 3.1, the Data Controller may retain your personal data for the time required by specific regulations, as amended from time to time.

Art. 4 Transfer of personal data

4.1 The Data Controller is located in a country that has an adequate level of security from a regulatory standpoint. If the transfer of your personal data takes place to a non-EU country and for which the European Commission has expressed a judgment of adequacy, the transfer is deemed safe from a regulatory standpoint in any case. This article 4.1 indicates from time to time the countries where your personal data may possibly be transferred and where the European Commission has expressed a judgment of adequacy.

4.2 You are therefore invited to access this article regularly to check whether the transfer of your personal data takes place in a country with these characteristics.

4.3 Without prejudice to what is stated in article 4.1, your data may also be transferred to countries outside the EU for which the European Commission has not issued an adequacy opinion. You are therefore invited to regularly review this article 4.2 to find out to which of these countries your data may be transferred.

4.4 In this article, the Data Controller indicates the countries in which it may specifically direct its activities. This circumstance may imply the application of the legislation of the reference country, together with that which governs the relationship with the user as indicated in the Preamble.

At the request of the user, the Data Controller will apply to the processing of personal data any more favourable legislation provided for by the user's national legislation.

Art. 5. Your rights

The Data Controller informs you that you have the right:

- to request from the Data Controller access to your personal data and the rectification or erasure of the same or the restriction of the processing thereof or to object to the processing thereof, in addition to the right to data portability
- revoke consent at any time without affecting the lawfulness of the processing based on the consent given before revocation
- to lodge a complaint with a supervisory authority (e.g. the Italian Data Protection Authority).

The rights referred to above may be exercised by making a request without formalities to the contacts indicated in the Introduction.

Art. 6. Amendments

The Data Controller reserves the right to make changes to this policy at any time, giving appropriate publicity to users of the Site and ensuring in any case an adequate and similar protection of personal data. In order to view any changes, you are invited to regularly consult this policy. In case of substantial changes to this privacy policy, the Data Controller may give notice of such changes also by email.