

PRIVACY POLICY

pursuant to Articles 13 and 14 of EU Regulation 2016/679 (GDPR)

Website: www.alberigo.eu

Last updated: 26 May 2026

1. Data Controller

The Data Controller of personal data is:

AleMar Web S.r.l.

Registered office: Via Sangallo, 178 – 53036 Poggibonsi (SI), Italy

Operational office: Via Dante Alighieri, 8 – 50021 Barberino Tavarnelle (FI), Italy

VAT / Tax Code: 01276690524

Phone: +39 055 0107502

E-mail: info@alberigo.eu

PEC: info@pec.alemarweb.it

2. Data Protection Officer (DPO)

The Data Controller has not appointed a Data Protection Officer as the conditions of Article 37 GDPR do not apply. For any matter relating to the processing of personal data, please contact the Data Controller directly at the contact details indicated above.

3. Categories of personal data processed

Through the website www.alberigo.eu, the Data Controller may collect and process the following categories of personal data:

3.1 Data voluntarily provided by the user

These are the data that the user provides by filling in the forms available on the website (Demo Request, Quotation Request, Free Trial Activation, Newsletter Subscription, Contact):

- first name and surname;
- name and type of accommodation facility (hotel, agritourism, holiday home, etc.);

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- e-mail address;
- phone number;
- any further information freely provided in the message field or in subsequent communications.

3.2 Browsing data

The IT systems and software procedures used to operate the website acquire, during their normal operation, certain personal data whose transmission is implicit in the use of Internet communication protocols. These include: IP addresses, type of browser and operating system, domain names of the computers used for the connection, URIs of requested resources, time of request, method used to submit the request, size of the file obtained in response, numerical code indicating the server response status. These data are processed exclusively to obtain anonymous statistical information on the use of the website and to verify its proper functioning.

3.3 Cookies and similar technologies

For detailed information on the cookies used by the website, please refer to the Cookie Policy available below in this document and accessible from the footer of the website.

4. Purposes of processing and legal bases

Personal data are processed for the following purposes, each based on its own legal ground:

a) Reply to Demo, Quotation and Free Trial requests

Purpose: providing the requested information, preparing quotations, activating the Alberigo PMS trial area and responding to user requests.

Legal basis: performance of pre-contractual measures taken at the request of the data subject (Article 6(1)(b) GDPR).

Nature of the provision: the provision of mandatory data is necessary to fulfil the request; failure to provide such data will result in the impossibility of processing the request.

b) Newsletter subscription and commercial communications

Purpose: sending newsletters, updates, informational materials and promotional communications regarding the Data Controller's services.

Legal basis: specific, freely given and explicit consent of the data subject (Article 6(1)(a) GDPR). Consent may be withdrawn at any time via the unsubscribe link included in every communication or by writing to info@alberigo.eu.

Nature of the provision: optional; failure to provide data results only in the inability to receive communications and does not affect access to other services.

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c) Handling of support and contact requests

Purpose: responding to requests for information or support sent via e-mail, telephone or contact forms.

Legal basis: legitimate interest of the Data Controller in responding to received communications (Article 6(1)(f) GDPR), or performance of pre-contractual/contractual measures where applicable (Article 6(1)(b) GDPR).

d) Compliance with legal obligations

Purpose: complying with obligations under applicable law, including tax, accounting and administrative regulations, and responding to requests from competent Authorities.

Legal basis: legal obligation to which the Data Controller is subject (Article 6(1)(c) GDPR).

e) Defence of legal rights

Purpose: establishing, exercising or defending legal claims.

Legal basis: legitimate interest of the Data Controller (Article 6(1)(f) GDPR).

f) Use of analytical and profiling cookies

Purpose: analysis of website use and marketing profiling through cookies and similar technologies.

Legal basis: consent of the data subject given through the cookie banner (Article 6(1)(a) GDPR and Article 122 of Italian Legislative Decree 196/2003 – Privacy Code).

5. Processing methods

Personal data are processed by means of IT and telematic tools, with logic strictly related to the purposes indicated and, in any case, in such a way as to ensure the security and confidentiality of data pursuant to Article 32 GDPR. Adequate technical and organisational measures are adopted to protect data against unauthorised access, loss, destruction or unlawful processing.

6. Data retention period

Personal data are retained for the time strictly necessary to achieve the purposes for which they were collected, and in particular:

- **Demo, Quotation and Free Trial requests not converted into clients:** 24 months from the last contact;
- **Data relating to active clients:** for the entire duration of the contractual relationship and for 10 years thereafter, in compliance with civil and tax obligations (Articles 2220 of the Italian Civil Code and 22 of Italian Presidential Decree 600/1973);

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- **Newsletter and commercial communications:** until the data subject withdraws consent, subject to periodic verification of consent every 24 months;
- **Support requests and general contacts:** 12 months from the last contact, unless otherwise required;
- **Browsing data and system logs:** maximum 6 months, unless specific investigative or crime-detection needs arise;
- **Cookies:** according to the durations indicated in the Cookie Policy.

At the end of the indicated periods, the data will be deleted or irreversibly anonymised, except for further retention obligations imposed by law.

7. Recipients or categories of recipients

Personal data may be disclosed to the following categories of subjects, who will process them as Data Processors pursuant to Article 28 GDPR or as autonomous controllers:

- employees, collaborators and consultants of the Data Controller, duly authorised and instructed for the processing;
- providers of IT and technical services (hosting, website maintenance, IT security, e-mail management);
- providers of consent management and privacy/cookie notice services (Acconsento.click);
- providers of statistical analysis and marketing services (Google LLC for Google Analytics, Google Tag Manager, reCAPTCHA, AdSense, YouTube; Meta Platforms Ireland Limited for Facebook Pixel);
- tax, legal and commercial consultants and appointed professionals;
- judicial Authorities, Public Administrations and Supervisory Bodies, where required by law.

The updated list of named Data Processors is available upon request by writing to info@alberigo.eu.

Personal data are not disseminated.

8. Transfer of data outside the European Union

Some of the service providers used by the website (in particular Google LLC and Meta Platforms Inc.) are based in the United States of America or may transfer personal data outside the European Economic Area (EEA).

Such transfers take place in compliance with the safeguards provided for in Chapter V of the GDPR, in particular on the basis of:

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- the European Commission's adequacy decision of 10 July 2023 on the EU-U.S. Data Privacy Framework (DPF), for U.S. providers certified to the programme;
- Standard Contractual Clauses (SCC) approved by the European Commission, where necessary;
- supplementary technical and organisational measures adopted by individual providers.

A copy of the adopted safeguards may be requested by writing to info@alberigo.eu.

9. Rights of the data subject

As a data subject, you may at any time exercise the rights provided for by Articles 15-22 GDPR against the Data Controller, namely:

- **Right of access** (Art. 15): to obtain confirmation as to whether processing of your data is taking place and to access related information;
- **Right to rectification** (Art. 16): to obtain correction of inaccurate data or completion of incomplete data;
- **Right to erasure** (Art. 17 – "right to be forgotten"): to obtain deletion of data in the cases provided for;
- **Right to restriction of processing** (Art. 18);
- **Right to data portability** (Art. 20): to receive your data in a structured, commonly used and machine-readable format, and to transmit it to another controller;
- **Right to object** (Art. 21): to object to processing based on legitimate interest and, in any case, to processing for direct marketing purposes;
- **Right to withdraw consent** at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- **Right not to be subject to automated decision-making** (Art. 22), including profiling that produces legal effects or similarly significantly affects the data subject. The Data Controller does not carry out such automated decision-making processes.

10. How to exercise your rights

Rights may be exercised at any time, free of charge, by writing to:

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Via Sangallo, 178 – 53036 Poggibonsi (SI), Italy

E-mail: info@alberigo.eu

Phone: +39 055 0107502

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The Data Controller will respond within one month of receipt of the request, with a possible extension of two further months in case of particular complexity pursuant to Article 12(3) GDPR.

11. Right to lodge a complaint with the Supervisory Authority

If you consider that the processing of your personal data infringes the Regulation, you have the right to lodge a complaint with the Italian Data Protection Authority (Art. 77 GDPR):

Garante per la protezione dei dati personali

Piazza Venezia, 11 – 00187 Rome, Italy

Tel.: +39 06 696771 – Fax: +39 06 69677 3785

E-mail: garante@gpdp.it – PEC: protocollo@pec.gpdp.it

Website: www.garanteprivacy.it

The right to bring an action before judicial authorities remains in any case unaffected. Data subjects residing in other EU Member States may also lodge a complaint with their local Supervisory Authority.

12. Data security

The Data Controller adopts appropriate technical and organisational measures to ensure a level of security appropriate to the risk, pursuant to Article 32 GDPR, including – where necessary – the pseudonymisation and encryption of personal data, measures to ensure the confidentiality, integrity, availability and resilience of systems, and procedures for regularly testing the effectiveness of the measures adopted.

13. Changes to the Privacy Policy

This privacy notice may be updated at any time to reflect any regulatory or organisational changes. Updated versions will be published on the website www.alberigo.eu, indicating the date of last modification. Users are invited to consult this page periodically.

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