

Communication of Data Controller Change

Dear Stakeholders (Employees, Customers, Suppliers),

We inform you that starting from July 2024, the controller of your personal data will be Erqole Hospitality S.r.L., with its registered office in Monte Argentario (GR), Via Privata Cirio snc 58018 (Porto Ercole), PEC: erqolehospitality@pec.it, represented by its legal representative pro tempore.

This change is due to a change in management.

Source

Please be informed that your personal data was obtained from the previous controller, Cala Piccola S.p.A., tax code/VAT 01806350482, with its registered office in Florence, Via Benedetto Varchi no. 3.

The new controller, Erqole Hospitality S.r.L., has entered into a joint controllership agreement with the following companies within the Erqole group:

- Erqole S.r.L., with its registered office in Monte Argentario (GR), Via Privata Cirio snc 58018 (Porto Ercole), PEC: erqole@pec.it, represented by its legal representative pro tempore.
- Erqole Properties S.r.L., with its registered office in Monte Argentario (GR), Via Privata Cirio snc 58018 (Porto Ercole), PEC: erqoleproperties@pec.it, represented by its legal representative pro tempore.
- Erqole Community S.r.L., with its registered office in Orbetello (GR), Via Aurelia Km 145 58015, PEC: hoteltris@cgn.legalmail.it, represented by its legal representative pro tempore.
- Erqole Cala Piccola S.r.L., with its registered office in Monte Argentario (GR), Via Privata Cirio snc 58018 (Porto Ercole), PEC: erqolecalapiccola@pec.it, represented by its legal representative pro tempore.
- Società Agricola La Capitana S.r.L., with its registered office in Monte Argentario (GR), Via Privata Cirio snc 58018 (Porto Ercole), PEC: lacapitanaagricola@pec.it, represented by its legal representative pro tempore.

Erqole Hospitality S.r.L. will continue to process your personal data for the same purposes for which they were originally collected.

Different Purpose for Processing

Should the new controller intend to further process personal data for a purpose other than that for which they were collected, we will provide you with information regarding this new purpose and any other relevant information before any further processing.

The legal basis for processing is:

- The intent to complete the contract and fulfill the contractual obligations signed between the parties.
- Compliance with a legal obligation.
- Any consent already provided.
- The pursuit of the legitimate interest of the data controller.

We want to assure you that the change in ownership will not affect your rights, and any consent you have given for the processing of your data may be withdrawn at any time.

To revoke consent, you may contact the Data Controller at [privacy@erqole.it] or send a written communication to [Erqole Hospitality S.r.L., Monte Argentario (GR), Via Privata Cirio snc 58018 (Porto Ercole)].

The main categories of personal data are:

- Identification data
- Financial data
- Contact details, etc.

Information on Security Measures

The new controller is committed to ensuring the maximum protection and confidentiality of your personal data in compliance with the applicable data protection regulations.

The security measures adopted include:

- **Protected Data:** All personal data, including identification data, contact details, financial and employment information, are protected through advanced security measures.
- **Security Standards:** The new controller strictly follows the standards imposed by the GDPR and other international data protection regulations.
- **Security Technologies:** We use state-of-the-art technologies such as encryption and multi-factor authentication to safeguard access and data transmission.
- **Employee Training:** Our staff is regularly trained on best data security practices and confidentiality protocols.
- **Audits and Monitoring:** We conduct regular security audits and continuously monitor our systems to prevent and detect any suspicious activity promptly.
- **Incident Response:** We have clear and tested procedures in place to effectively respond to any security incident, minimizing its impact and promptly informing the affected parties.

Data Retention Period Information

Regarding the change of the data controller, we wish to provide you with important details regarding the retention of your data:

- **Retention Period:** Personal data will be kept for no longer than necessary for the purposes for which they were collected, in accordance with applicable law.
- **Retention Criteria:** The retention period is determined based on the nature of the data, the purposes of processing, and any legal or regulatory obligations.
- **Right to Erasure:** You have the right to request the deletion of your personal data when they are no longer needed or if you wish to withdraw your consent.
- **Deletion Procedure:** To exercise the right to erasure, you may send a written request to the specified contact details.
- **Archiving and Backup:** We adopt strict archiving and backup policies to protect data from accidental loss or cyber-attacks, ensuring their availability and integrity over the long term.

Recipients and Categories of Personal Data Recipients

The data will be processed internally by authorized personnel under the responsibility of the Data Controller for the above-mentioned purposes.

Data may also be communicated to external data processors who have entered into specific agreements, conventions, or protocols of understanding or contracts with the Data Controller, as well as to joint controllers.

Information on the International Transfer of Personal Data

Please note that following the change of data controller, your data will not be transferred to entities located outside the EU.

Management of Personal Data Rights Requests

As data subjects, you have the right to manage your personal data and exercise the following rights:

- **Access:** You can request a copy of the personal data we hold about you.
- **Rectification:** You have the right to correct inaccurate or incomplete data.
- **Deletion:** You can request the deletion of your data when they are no longer necessary.
- **Restriction:** You may request the restriction of the processing of your data in certain circumstances.
- **Portability:** You have the right to receive the data in a structured format and transfer it to another controller.

To exercise these rights, please send your request to [privacy@erqole.it], specifying the right you wish to exercise and providing the necessary information to identify yourself.

We are committed to responding to your requests as quickly as possible and, in any case, within 30 days of receipt.

Profiling

The data controller does not use automated processes aimed at profiling.

Complaint

We inform the data subject that they have the right to file a complaint with the supervisory authority, and for more details, they can consult the official website of the Privacy Guarantor at www.garanteprivacy.it.

For any questions or clarifications, please do not hesitate to contact us.

For further details, please refer to the updated privacy policy at [www.erqole.it].

Porto Ercole, April 2024