

Privacy terms

SpecialItaly ("SI") and its further brand names "SpecialMarche", "SpecialPuglia", "SpecialSicily", "SpecialTuscany" and "SpecialUmbria", are business activities of the companies (i) SpecialItaly Properties S.R.L and (ii) SpecialItaly Management & Design S.R.L., both with legal headquarters in Largo Augusto 7, 20122 Milan, Italy and operational offices in Vocabolo Polino Alto 25, 06066 Piegaro (PG), Italy respect its clients' privacy and is committed to ensuring that such privacy is protected in conformance with applicable laws. The data controller is SI; for any request concerning this privacy notice or the processing of your personal data or if you wish to exercise your data protection rights, you may contact SI at: info@specialitaly.com. In these privacy terms ("Privacy terms") you can read which information SI stores, how and where this data is secured, as well as how SI uses this information. The Privacy terms apply to our Website (www.specialitaly.com and all related websites) as well as the services offered by SI to you under any contract. SI complies with the General Data Protection Regulation, and where implemented, relevant provision of Italian law.

Are you under the age of sixteen?

If you are younger than sixteen (fourteen in Italy) years old, you cannot use our Website and services without the permission of your parents or legal guardian.

Personal data

To offer our Website and perform our services we process personal data. "Personal data" means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Lawfulness of processing

We can store, process and manage your data at various moments, for example when you visit our Website, create an account via our Website, use our Services or when you contact us. We are allowed to process your personal data because we explicitly ask your permission, we have a legal obligation and/or we have a legitimate interest with reference to these Privacy terms. In addition, we need your data to carry out the agreement between you and us. If you choose not to share your data, then we cannot deliver our services to you.

Treatment personal data

If and when you book a short-term rental, you sell and/or buy a real estate property, or have your real estate property (project) managed through SI, you are automatically added to its customer address database. SI will use your information to inform you of the status of your reservation and payment and send you the necessary details about your stay. In case of a real estate purchase and/or sale, or (project) management of real estate property, SI will use the information to communicate directly with you. SI will in no case provide your personal information to any third party unless explicitly authorized by you, except those third parties who process data under a contract with us and under the applicable privacy rules.

Collected personal data

SI informs you that for the achievement of the contractual purpose, the data relating to you may be communicated to third parties such as, but not limited to: natural or legal persons involved in the conclusion of the agreement, authorities, administrative persons or entities and any others related to the *Special Italy* and its related brand names are business activities of SpecialItaly Properties S.R.L. and SpecialItaly Management & Design S.R.L., Milan/Piegaro, Italy
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sale/purchase, rental and/or (project)management of properties and performance of functional activities to the completion of all obligations under the contract entered into. Your data may be shared with employees or business partners of SI in order to achieve the obligations under the contract. Your personal data may be shared, strictly in connection with the purposes indicated above, with the following categories of recipients:

- service providers acting as data processors on behalf of SI (e.g. IT hosting and maintenance providers, email service providers, payment processors, customer care providers, marketing agencies);
- professional advisors (e.g. lawyers, accountants, auditors) bound by confidentiality obligations;
- public authorities, law enforcement or judicial authorities when required by applicable law or to protect our rights;
- other companies under the SI brand for internal administrative purposes, on the basis of a data sharing agreement, where applicable.

Data retention

We keep your personal data only for as long as it is necessary to achieve the purposes for which they were collected, to comply with legal obligations, to protect our rights, and in any case in accordance with the data minimization and storage limitation principles. Once the relevant retention period has expired, personal data will be securely deleted or anonymized.

Automatically collected information

The following information is automatically recorded on the SI server when you visit the Website:

- the pages which are visited, for SI statistics;
- your IP address (a unique number which is automatically assigned to your computer by your internet provider when you enter the internet), in order to be able to identify you as a unique visitor for SI statistics;
- the name of your computer system and type of internet browser, so that SI may continue to improve the systems which its visitors use, and so that SI will be able to solve any potential future problems. No personal information whatsoever will be read from your computer through this process. In addition, under no circumstances will this information be used to personally identify you.

Cookies

Our Website uses cookies, temporary (text)files which, if accepted by you as user of our Website, are stored on your computer in which information is saved for use on our Website. SI uses the cookies for Google Analytics. The information generated by the cookie about your use of our Website (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. Google will use this information for the purpose of evaluating your use of our Website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our Website. By using our Website, you consent to the processing of data by Google in the manner and for the purposes set out above. The Website also uses AddThis for which cookies are collected.

Social media

It is possible that the provider of social media sends us information (according to its policy), if you use social media functions on our Website. That can be your name, profile picture, gender, friends list and other information that you provided previously to them. If you don't want the social media provider to send us such information, you should change the privacy settings on your social media account.

If you are on a webpage that uses social media add ins, your browser sends certain information to the

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provider of your social media account. SI does not control this data sharing.

Newsletter

SI offers digital newsletters. In such way, you are fully informed of all SI's offers and other news. We use an opt-in system for registration of the newsletter. Every time we send you a newsletter you have the possibility to unsubscribe by pressing on the "unsubscribe" link in the footer of the newsletter.

Security

SI works hard to protect your personal data from unauthorized or unlawful access, alteration, disclosure, use or destruction. That way, unauthorized persons do not have access to your personal data. SI takes the following measures to protect your personal data:

- Secure network connections with Secure Socket Layer (SSL) technology or a technology that is similar to SSL;
- Secure environment of data that comply to the standards of ISO 27001;
- Secure environment of data that comply to the standards of ISO 27002;
- The access to the data is limited to the persons that need the data;
- The access of the data is secured with two-step verification.

How long does SI store your data?

SI shall store your personal data for as long as necessary to fulfill the purposes listed above.

With whom does SI share your personal data?

Processors

SI may share your personal data with others. In a data processing agreement, SI shall agree with those parties that they shall use your data carefully and they shall only receive the data that is relevant for their services. These parties use your data in accordance with SI instructions and not for their own purposes. SI can share your data for example with online storage services, public authorities [e.g. personal (ID) data for rental stays] and payment service providers. They will take care of the storage of the data and the correct processing of vouchers, invoices, payment details and other related communication with the client. These parties are 'processors' within the meaning of the relevant legislation.

Third parties

Sometimes SI shares your data with third parties who are not processors. SI will agree with those parties that they will use your data carefully. They will only use your data in accordance for the purposes that SI received your data for.

Transfer

SI will only process your data within the European Union (EU), and outside of the EU if the involved non-EU country has an effective protection level for your data. SI will never transfer your data to other countries or other parties than described above. Provision of certain information is mandatory by Italian law and will only be shared with the Italian authorities. As already stated above, all provided personal identification information and data will be destroyed or anonymized once the relevant retention period has expired. Certain identification data used exclusively for security deposits/identification are deleted no later than 2 weeks after the end of the rental period, unless they are necessary to establish, exercise or defend legal claims or to comply with legal obligations.

Breach

For information on how SI handles any information breach, please consult our data breach policy, published on the Website.

Links

You may find advertising or other content on our Website that link to other websites. SI does not control the content on these websites and is not responsible for the content (with any eventual errors

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and/or omissions) on these websites or the privacy protection of these websites. SI advises you to read the privacy policies of those websites.

Payments

For its rental activities SI uses the payment services of Mollie (www.mollie.com). Mollie is an exclusive business partner of SI, certified to handle third party payments for its clients. Payments to SI will be listed as 'Stg Mollie Payments' in your bank statement.

Copyright

SI maintains copyright on its own information provided through its website, including its own names, trademarks, logotypes, logos and photo material. None of the texts, pictures or graphics on the website may be published, distributed and/or copied without written permission by SI. Use of the information for private purposes is permitted.

Public Information

Information you provide as feedback will be read by other visitors. Please take care you do not put any personal information into your feedback. SI reserves the right to reject or modify responses at its sole discretion and without giving its reasons for doing so.

Disclaimer

All information provided on our Website is SI responsibility and is provided AS IS. SI pays the greatest attention to keeping the information on its Website as current, accessible, correct and complete as possible. Nevertheless, the information on the Website may sometimes become outdated, incomplete or indeed incorrect. No rights shall thus be derived from the information provided on this Website. SI cannot be held liable for the consequences of any use of the information which is supplied on its website.

Modifications to these Privacy terms

SI may update our Privacy terms from time to time. When SI changes these Privacy terms in a significant way, SI will post a notification on its Website along with the updated Privacy terms. SI also informs users that are registered with an email address in case of any significant moderation. If you are not registered as a user, SI advises you to visit the Website and read these Privacy terms regularly.

Your rights

The data SI collects is personal. Therefore, you have the following rights under the conditions set out in articles 15 – 22 of the G.D.P.R.:

- Right of access: to obtain confirmation as to whether or not we process personal data concerning you and, if so, to access such data and receive information on the processing and a copy of the data;
- Right to rectification: to obtain the correction of inaccurate personal data and the completion of incomplete data;
- Right to erasure ('right to be forgotten'): to obtain the deletion of your personal data where the conditions set out in GDPR;
- Right to restriction of processing: to obtain the restriction of processing in the cases provided for by GDPR;
- Right to data portability: to receive in a structured, commonly used and machine-readable format the personal data you have provided to us, and to transmit those data to another controller, where the processing is based on consent or on a contract and is carried out by automated means;
- Right to object: to object at any time, on grounds relating to your particular situation, to processing based on our legitimate interests, including profiling, and to object at any time to processing for direct marketing purposes;
- Right to withdraw consent: where processing is based on your consent, you may withdraw it at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- Right to lodge a complaint: you have the right to lodge a complaint with the supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged

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infringement. In Italy, the competent authority is the “Garante per la protezione dei dati personali (www.garanteprivacy.it)”.

Please contact SI by email (info@specialitaly.com) if you would like to receive a written copy of your information registered by SI or if you would like to have your data changed. You will receive a reply as soon as possible and in any event within one month of receipt, which may be extended by two further months in case of complex or numerous requests; in such case we will inform you of any extension and the reasons for the delay.

Contacting Us

If you have any questions about these SI Privacy terms or any other matter with regard to SI services or its Website, then feel free to contact SI without any obligation. Your question or comment will be handled professionally and confidentially as quickly as possible.

(1) SpecialItaly Properties S.R.L.

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