

PRIVACY POLICY FOR THE WEBSITE WWW.GRAFENSTEIN.INFO

On this page, Hotel Grafenstein explains how it handles data for the users who visit its website and the behaviour of the cookies its site installs.

This Privacy Policy is provided in compliance with article 13 of GDPR 2016/679 (General Data Protection Regulation, the European regulation on the protection of personal data), the Guidelines of the Garante Privacy of 10. June 2021, the Guidelines EDPB 5/2020 on consent, the ECJ Judgment 1 October 2019 C-673/17, the general Act of the Garante Privacy [the Italian Data Protection Authority] on cookies no. 229 of 8 May 2014, the Working Document 02/2013 providing guidance on obtaining consent for cookies", the opinion of WP 29 no. 4/2012 on cookie consent exemption, the Directive 2002/58/EC, the Recommendation no. 2/2001 by the Workgroup under article 29.

The following information applies only to the site www.grafenstein.info; the data controller is not responsible for any data entered or cookies installed by other sites that may be consulted using links.

Information on the data controller

The data controller is Hotel Grafenstein, with legal offices at Verdins street 32/B, 39017 Scena (BZ). To exercise your rights under the regulations, you can contact the data controller at his/her office or by calling +39 0473 945765 or sending an email to info@grafenstein.info.

Purpose and legal basis for data processing

The Hotel Grafenstein handles data provided by the user through the site for the following purposes:

a. Fulfilment of obligations established by law, by regulations, or by community regulations

The provision of data for this purpose is mandatory and the legal basis for processing it is the fulfilment of a legal obligation to which the data controller is subject, as established by article 6, paragraph 1c of the GDPR. The processing of personal data for these purposes does not require the user's consent. The processed data will be kept for the time foreseen by the referenced legislation.

b. Statistical analysis on aggregate or anonymous data

This processing doesn't allow for the identification of the user, but simply wants to verify the adequacy of adopted web marketing campaigns and/or the correct functioning of the site, measuring user traffic generated. The processing of aggregate or anonymous data, which does not allow for the identification of the user, does not fall within the scope of the application of the law on the protection of personal data and therefore no consent is required for its processing.

c. Request for information, contact and support

The provision of the requested data is necessary to provide feedback to your request. The legal basis of the processing is indicated by Article 6 paragraph 1b of the GDPR, and it is the execution of a contract of which the interested party is party to or the execution of pre-contractual measures adopted at the request of the same, as well as by Article 6 paragraph 1f, and is the pursuit of a legitimate interest of the data controller or third parties. The data processed and relating to your request will be kept by us for 30 days.

d. Newsletter

The provision of the data required to register for our newsletter and/or to send you communications and promotional materials is entirely optional and the legal basis for this treatment is the express consent of the data subject to the processing of his/her personal data. The data processed for promotional and marketing purposes will be kept by us until its revocation, unless consent to its processing is renewed.

e. Profiling (creating profiles based on the user's preferences, habits and consumption choices)

The activity in question can be carried out by filling in dedicated questionnaires or by using online profiling technologies (trackers) or cookies. Providing the data required for profiling activities is optional and the legal basis for processing is the consent given by the data subject to the processing of his/her personal data. The data processed for the purposes of profiling will be processed until its revocation and for a maximum of 30 days, unless consent to its processing is renewed.

f. Availability and quote requests, booking and reservations

The provision of the data requested is necessary to provide feedback to your inquiry. The legal basis of the processing is indicated by Article 6 paragraph 1b of the GDPR, and it is the execution of a contract of which the interested party is a part or the execution of pre-contractual measures adopted at the request of the same, as well as by Article 6 paragraph 1f, and is the pursuit of a legitimate interest of the data controller or third parties. The data processed and related to your request will be kept by us, in the event of a reservation, for the time required by civil, accounting, and tax laws (10 years) or alternatively, in the case of simple request for availability/quote, for 30 days.

g. Gift certificate purchase

Providing the required data is necessary to purchase a gift certificate. The legal basis of the processing is indicated by Article 6 paragraph 1b of the GDPR, and is the execution of a contract of which the interested party is part or the execution of pre-contractual measures adopted at the request of the same. The data processed and related to your request will be kept by us for the time required by civil, accounting, and tax law which amounts to 10 years.

Processing methods, automated decision-making processes, and data retention times

The processing of your data takes place electronically, although potential paper-based processing is not excluded. No automated decision-making processes are used to process your personal data.

Data collected through cookies will be kept for the period of time established by the individual cookie. Additionally, if profiling cookies are used by the site their function must be described, as required by the specific section.

Data communication (Recipients)

To guarantee the functioning of our website and the use of its content, we may rely on use third-party suppliers such as IT service providers, hosting companies, and communication companies. In addition, to guarantee the requested service, for example in the case of the purchase of products and the likes, we may also use additional third-party suppliers (postal couriers, etc.). The legal basis of the communication is the fulfilment of contractual and regulatory obligations, as well as the execution of pre-contractual measures adopted at your request. It is understood that we will only communicate to the Addressees the data necessary to be able to perform the service, preferring, where possible, the anonymization of the data. The information you provide will not be disclosed without your specific prior consent.

As for the use of third-party cookies, please refer to the specific section at the end of this document.

Transfer of data to third countries or international organizations

The data you have provided will not be transferred by us to third countries or international organizations outside the EU. The hosting of the site is within the European Community.

Rights of the interested party and complaints to the Privacy Guarantor

You have the right to request access to your data at any time, its modification, integration, or deletion, limitation or opposition to its processing, where legitimate reasons exist, as well as the portability of the aforementioned data to another Data controller. We will reply in writing to any requests within 30 days. You can revoke, at any time, consent given to this site, by contacting one of the addresses listed in this Privacy Policy. You may also lodge a complaint with the National Control Authority, if you believe that your data has been illegitimately processed.

COOKIES ON OUR SITE

Navigation data

This website implicitly acquires, using Internet communications protocols, for and in the course of its normal operations, some personal data on the users who access the site, like IP address, domain names of the computers used for access, MAC addresses assigned by network and wireless card manufacturers, etc.

This information is not collected for the purpose of identifying users, but this could be done by associations and processing, including cross-referencing with third-party data; statistical information is obtained from this data on site usage and operations and further information in cases of establishing responsibility related to computer crimes.

What are cookies?

Cookies are small text strings that the websites visited by a user install on the user's terminal; these strings are then re-transmitted to the site that installed them upon further visits by the user. When the user also receives cookies sent by other sites or web servers during site navigation, those cookies are called third-party cookies.

Cookies are installed for various purposes, possibly including the performance of computer authentications, navigation session monitoring, and language choice.

First-party cookies and third-party cookies

The cookies that are installed directly by Hotel Grafenstein are called 'First-party cookies', and the cookies that are installed and acquired by a site other than the one the user is navigating are called 'Third-party cookies'.

Third-party cookies may include social media buttons (or social media plug-ins), which allow the site to interact with the most popular social media sites, such as Facebook, Instagram, LinkedIn, Twitter, etc., or Google Analytics cookies, which are necessary to implement YouTube iframes, etc. As regards third-party cookies, it is the responsibility of the third parties installing those cookies to provide statements and information on the handling of the data collected.

Types of cookies

Technical cookies

These are normally installed directly by the site administrators and are cookies that allow communications between the site and the user. They can also be called “navigation cookies”, “session cookies”, “essential cookies” or “necessary cookies” and are designed to ensure normal navigation and use of the site and usually last as long as the site is being navigated.

As these cookies are necessary for the functioning of the site, it is not necessary to obtain prior consent for their installation on the user’s terminal.

Functionality Cookies

These cookies provide the user with advanced functionalities and customizations, and they also remember the preferences indicated by the user during previous visits, or the user modifications performed during previous visits in order to customize the site. The cookies that fall under this category, for example, allow the user to choose a language or save the selected products in the cart.

Performance Cookies

These “performance cookies” are also known as “analytical cookies”, and they provide an analysis of how the user uses the site in order to improve the navigation experience and resolve issues related to navigation.

These cookies, for example, allow counting visits and tracking traffic sources or the most viewed pages.

They usually don’t identify the individual user, but rather they contain aggregated data that is therefore anonymous.

One of the best-known tools for obtaining such statistical reports is Google Analytics, a service provided by Google Inc.

Profiling cookies

They can also be called “advertising cookies” and are used to track a user’s preference and offer him/her advertising messages based on those preferences.

First access banner

In the event cookies other than technical cookies are used, the Act of 8 May 2014 by the Garante Privacy and the Guidelines of the Garante Privacy of 26 November 2020 require the site to provide a banner when a user first accesses the site (called a short notice) that summarises information on the processing methods the site uses for cookies. The banner must refer to the privacy policy in full and must provide a request for consent to the installation of the cookies, even by way of granular selection.

Hotel Grafenstein has provided this banner. It has also provided a specific cookie that records the user's choice regarding cookie installation for 180 days; this means that the user (once given the consent) will see the cookie only one time, and if he/she should later wish to change the choice made, he/she can do this from the "Manage my cookies" link.

Facebook permissions requested by the site.

Our site may require you to log in with your Facebook account to perform certain actions and collect information directly from Facebook.

For more information on how this feature works, see <https://developers.facebook.com/docs/facebook-login/permissions> and <https://www.facebook.com/about/privacy/>

ADDITIVE+ LANDINGPAGE - Online Marketing and Landing Pages

Beside our website we do also operate optimized landing pages for means of <https://www.additive.eu/en/hotel-marketing-software-automation/online-marketing-hotel.htm> hotel online marketing. To process your request, reservation, order, activation, registration or the transmission of other contact forms on our website as well as to save and store your data we use cloud services, CRM systems and software provided by ADDITIVE Srl, 39011 Lana (BZ), Italy ("ADDITIVE"), our partner in the field of <https://www.additive.eu/en> hotel digital marketing. The adequate level of data protection is based on data processing agreements with the respective company.

Our landing pages use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics enables website operators to analyse the user behavior of the visitors. The information about the user behavior is transmitted to and stored by Google on its servers.

Your IP address is collected but immediately anonymised (for example by deleting the last 8 bits). As a result the geolocation data is less accurate.

You can prevent the data collection connected to your use of our online services through cookies and the processing of this data by Google, by installing the browser-plugin available at the following link: <https://chrome.google.com/webstore/detail/google-analytics-opt-out/flaojicojecljbmefodhfapmkgchbnh>

ADDITIVE has an insight into data gathered through Google Analytics. This data will be used only to analyse the use of our websites and to evaluate our marketing and distribution strategies.

Our website and landing pages also use functions provided by ADDITIVE for the multi-channel monitoring of the use of our websites as well as marketing and distribution strategies like landing pages, newsletter and social media presence. Information about your visits and submitted forms on our websites are also transmitted to ADDITIVE in order to evaluate and optimize our marketing and sales measures.

The data processing takes place in accordance with the requirements of art. 6 para. 1 lit f (legitimate interests) of the GDPR.

Our objective in accordance with the GDPR (legitimate interests) is the improvement of our products and services and our web presence through the analysis of the use of our website as well as marketing and distribution strategies.

Our website and our landing pages also use remarketing functions provided by Google Inc. ("Google") and by Meta Platforms Inc. ("Meta"). Therefore, Meta and Google will know that you have visited our website. This way visitors of our website and of our landing pages will find ads adapted to their interests on Google's advertising platforms and on the social media platforms Facebook and Instagram.

The data processing takes place in accordance with the requirements of art. 6 para. 1 lit a (consent) of the GDPR.

When you visit our landing pages a banner will inform you about the use of cookies for remarketing functions. If you continue using the website or click on the respective button you consent to the use of cookies. You can deny your consent anytime, by visiting the page containing the cookie information and denying the use in the banner that will be displayed.

ADDITIVE+ MARKETING AUTOMATION - Direct Marketing

In order to increase customer loyalty and to sell our services and additional services we use <https://www.additive.eu/en/hotel-marketing-software-automation/hotel-marketing-automation-crm-software.html> provided by ADDITIVE Srl, 39011 Lana (BZ), Italy ("ADDITIVE") within the field of <https://www.additive.eu/en/hotel-marketing-software-automation/marketing-automation-hotel.html> hotel marketing automation.

Therefore your data, which we gather and process in connection with your request, reservation, order, activation, registration or the transmission of other contact forms on our website, will be analysed and used to provide you with automatically generated offers for our services and additional services. Through the use of these services and systems your data will be processed and stored, at least in part, also outside of the EU or the EEC. The adequate level of data protection is based on data processing agreements.

You can deny the use of your data for this purpose anytime by clicking on the "unsubscribe" link in the respective message.

The data processing takes place in accordance with the requirements of art. 6 para. 1 lit f (legitimate interests) of the GDPR.

Our objective in accordance with the GDPR (legitimate interests) is the prevention of competitive disadvantages, the increase in brand awareness and the maximisation of our economic success through an optimal use of the acquired contacts.

ADDITIVE+ VOUCHERS

On our website you have the possibility to buy vouchers by using the integrated <https://www.additive.eu/en/hotel-marketing-software-automation/hotel-voucher-software.html> voucher software. To process your purchase and to save and store your data we use software provided by ADDITIVE Srl, 39011 Lana (BZ), Italy ("ADDITIVE") in the context of <https://www.additive.eu/en/hotel-marketing-software-automation/coupon-marketing-hotel.html> voucher marketing. Through the use of these services and systems your data will be processed and stored in the EU.

The data you provide is required to fulfil the contract or to carry out pre-contractual measures. Without this data we cannot conclude a contract with you. The data will not be transferred to an outside third party, except for your credit card data which will be transferred to the payment provider and to our tax accountant to fulfil our tax obligations.

The data processing takes place in accordance with the requirements of art. 6 para. 1 lit a (consent) and/or lit b (processing necessary for the performance of a contract) of the GDPR.

ADDITIVE+ NEWSLETTER

On our website you have the possibility to subscribe to our newsletter. For the subscription we need your email address and your consent to receive our newsletter through ADDITIVE, our provider for <https://www.additive.eu/en/hotel-marketing-software-automation/newsletter-marketing-hotel.html> hotel e mail marketing. To provide you with relevant information we also gather and process voluntary information concerning interests, name, date of birth and country/region of origin in our <https://www.additive.eu/en/hotel-marketing-software-automation/hotel-newsletter-software.html> hotel newsletter tool.

After signing up for our newsletter you will receive an email containing a link to confirm the subscription.

Your subscription can be cancelled any time by clicking on the cancellation link in the respective newsletter.

To process your subscriptions and to send our newsletters we use software provided by ADDITIVE Srl, 39011 Lana (BZ), Italy ("ADDITIVE"). Through the use of these services and systems your data will be processed and stored, at least in part, also outside of the EU or the EEC. The adequate level of data protection is based on data processing agreements.