CASTELLO DI VELONA

RESORT · THERMAL SPA · WINERY · MONTALCINO

Privacy Policy

PURSUANT TO EU REGULATION 2016/679 (GDPR)

VERSION	ISSUE DATE	DATA CONTROLLER
2.1	**November 2026**	**Podere Castello 1997 S.r.l.**

Personal Data Processing Notice

Version 2.1 · November 2026 · Articles 13 and 14 of EU Regulation 2016/679 (GDPR)

1. Data Controller

Castello di Velona – Podere Castello 1997 S.r.l.

Località Monte Amiata Scalo n° 14-21, 53024 Montalcino (SI) – Italy
VAT No.: IT05377821003 | Tel.: +39 0577 839002
Email: info@castellodivelona.it | reservation@castellodivelona.it

2. Scope of Application

This Notice applies to all processing of personal data carried out through the website www.castellodivelona.it and its online booking platform, as well as to all activities connected with the services offered by the property, including communications sent by email:

- 5-star Resort with rooms and suites overlooking the Val d'Orcia
- OLISPA Thermal Spa (wellness treatments, day spa, thermal pools)
- Restaurants & Bars (Settimo Senso, Dolce Vita Pool Restaurant, Il Silene, Walter Redaelli)
- Organization of events, weddings, meetings and conferences
- Winery and online sale of wine (Brunello di Montalcino) and organic extra virgin olive oil
- Experiences and recreational activities in the Val d'Orcia
- Loyalty programs and gift vouchers

3. Categories of Data Processed and Collection Methods

3.1 Data provided directly by the data subject

a) **Room and suite bookings —** first name, surname, address, phone number, email, credit card details, stay dates, number of guests, special requests (allergies, accessibility, preferences).

b) **Purchase of gift vouchers or experiences online —** buyer's and beneficiary's details, address, phone number, email, payment details, any personal message.

c) **Purchase of wine and oil online (Wine & Oil Shop) —** name, shipping and billing address, phone number, email, payment details.

d) **Information requests and contact —** first name, surname, email, phone number, message content.

e) **Requests for events, weddings and meetings —** first name, surname, company, email, phone number, type of event, number of participants, dates, budget.

f) **Newsletter subscription —** first name, surname, email address and the preferences expressed regarding marketing consent and email tracking consent.

g) **Contact via WhatsApp** — phone number and content of the communication, managed through Meta Platforms Ireland Ltd.

3.2 Data collected automatically during browsing

While browsing, the following data is automatically collected through cookies and similar technologies: IP address, browser type, operating system, pages visited, duration of visit, referring site, and profiling data for advertising purposes. For full details, please refer to the Cookie Policy.

3.3 Special category data

The Data Controller does not intentionally collect special category data (Art. 9 GDPR). However, in connection with Spa bookings, the data subject may voluntarily provide information relating to health conditions or allergies; such data will be processed solely to provide the requested service.

3.4 Data collected through email communications

Only with the data subject's specific consent, when one of our promotional emails is opened or a link it contains is clicked, the following may be collected: date and time of opening, links clicked and technical data associated with the request (for example IP address, device type and email client). Full details are set out in Section 6.

4. Purposes and Legal Bases of Processing

Purpose	Legal basis (Art. 6 GDPR)
Managing bookings for rooms, suites and stay packages	Performance of a contract (Art. 6(1)(b))
Purchase of vouchers, experiences, wine and oil	Performance of a contract (Art. 6(1)(b))
Responding to information and quote requests	Pre-contractual measures (Art. 6(1)(b))
Tax, accounting and administrative obligations	Legal obligation (Art. 6(1)(c))
Managing complaints, disputes and legal claims	Legitimate interest / legal obligation (Art. 6(1)(c) and (f))
Sending newsletters and promotional communications	Consent (Art. 6(1)(a))
Individual measurement of email opens and link clicks (email tracking)	Specific consent, separate from marketing consent (Art. 6(1)(a) GDPR and Art. 122 Legislative Decree 196/2003)
Statistical analysis and improvement of the Website	Consent (Art. 6(1)(a))
Personalized advertising and remarketing	Consent (Art. 6(1)(a))
Performance monitoring and IT security	Legitimate interest (Art. 6(1)(f))
Management of the IPrefer / Preferred Hotels loyalty program	Contract / consent (Art. 6(1)(b) and (a))

5. Processing Methods and Security

Personal data is processed using automated and/or manual tools, in compliance with appropriate technical and organizational security measures (Arts. 25 and 32 GDPR). Financial transactions are carried out via SSL/TLS encrypted connections; credit card data is handled exclusively by PCI-DSS certified payment providers.

6. Email Communications and Tracking Consent

> *Section introduced with version 2.1, in accordance with the Guidelines of the Italian Data Protection Authority on the use of tracking pixels in email communications (Provision no. 284 of 17 April 2026).*

6.1 What tracking pixels are

Our promotional emails may contain tracking pixels, small invisible images hosted on a remote server, and links able to record clicks. When an email is opened or a link is clicked, these tools allow the event to be recorded (Open Tracking and Click Tracking).

6.2 Data collected and purposes

The data collected includes date and time of opening, links clicked and technical data associated with the request (for example IP address, device type and email client). This data is used to understand which content interests each recipient, to improve our communications and to adapt their content and frequency.

6.3 Legal basis: a specific, optional consent

Individual measurement of opens and clicks takes place exclusively on the basis of a specific consent (Tracking Consent), separate from the consent to receive promotional communications (Marketing Consent). Giving this consent is free and optional: without it, the data subject continues to receive our communications, with no individual measurement of opens and clicks and no limitation of any kind.

6.4 How to give and change your preferences

Consent can be given or changed through our Web Check-in, the quotes page and the dedicated preferences page, which can be reached at any time from the “Manage your preferences” link in our promotional emails. The choices made are recorded in the data subject's profile. From the same page it is possible to:

— withdraw the tracking consent only, while continuing to receive promotional communications;

— withdraw the marketing consent, stopping promotional communications and the related tracking.

Withdrawal takes effect from subsequent communications and does not affect the lawfulness of processing carried out before withdrawal. Preferences can also be changed by writing to info@castellodivelona.it.

6.5 Tools used

Emails are sent, and opens and clicks are measured, through the Guezzt platform of Serenissima Informatica S.p.A., acting as Data Processor (Art. 28 GDPR). For retention periods, please refer to Section 9.

7. Recipients and Disclosure of Data

Data Processors (Art. 28 GDPR)

— **Blastness S.r.l.** — website CMS and booking/voucher platform

— **Sabre Corporation / SynXis** — hotel booking platform

— **Payment providers** — for secure processing of transactions (PCI-DSS certified)

— **Google LLC** — Google Analytics, Google Ads, Google Hotel Ads (USA – standard contractual clauses)

— **Meta Platforms Ireland Ltd.** — Facebook Pixel and WhatsApp Business

— **Microsoft Corporation** — Microsoft Clarity, Bing Ads, Application Insights

— **Serenissima Informatica S.p.A.** — Guezzt CRM and email marketing platform: sending newsletters and, subject to specific consent, measuring opens and clicks

— **IPrefer / Preferred Hotels & Resorts** — loyalty program (subject to consent)

Independent Controllers

Judicial and tax authorities, in cases provided for by law; credit institutions, for the processing of payments.

The Data Controller does not sell or transfer personal data to third parties for the latter's own purposes.

8. Transfer of Data to Third Countries

Some recipients (Google LLC, Meta Platforms, Microsoft Corporation) are based in the USA or in other countries outside the EEA. Such transfers take place in compliance with Art. 46 GDPR, on the basis of:

— Adequacy decisions of the European Commission (including the EU-US Data Privacy Framework)

— Standard contractual clauses approved by the European Commission

9. Data Retention Period

Data type	Retention period
Booking and stay data	10 years (tax and accounting obligations)
Purchase data (wine, oil, vouchers)	10 years from the date of the transaction
Newsletter subscription	Until consent is withdrawn, max. 5 years from the last interaction
Email open and link click data	Until the tracking consent is withdrawn and in any case no longer than the retention period of the newsletter subscription
Information requests not followed by a contract	12 months from receipt
Cookie data	As specified in the Cookie Policy
Data processed for legal defense	For the entire duration of the proceedings

10. Rights of the Data Subject

— **Access (Art. 15)** obtain confirmation that processing is taking place and a copy of your personal data.

— **Rectification (Art. 16)** correct inaccurate data or complete incomplete data.

— **Erasure (Art. 17)** obtain deletion of your data in the cases provided for by the GDPR.

— **Restriction (Art. 18)** restrict processing in the cases provided for by law.

— **Portability (Art. 20)** receive your data in a structured, commonly used, machine-readable format.

— **Objection (Art. 21)** object to processing, in particular for direct marketing purposes.

— **Withdrawal of consent (Art. 7(3))** withdraw consent given at any time, including for email tracking only, without stopping the communications you receive.

— **Complaint to the Supervisory Authority** lodge a complaint with the competent Data Protection Authority.

To exercise your rights

Send a written request to: info@castellodivelona.it or reservation@castellodivelona.it

The Data Controller will respond within 30 days of receipt (extendable by a further 60 days in cases of particular complexity).

Italian Data Protection Authority (Garante Privacy): Piazza Venezia 11, 00187 Rome – www.garanteprivacy.it

11. Secure Online Booking

For online bookings, the user is redirected to the booking engine of Blastness S.r.l. and/or SynXis (Sabre Corporation), acting as Data Processors pursuant to Art. 28 GDPR. All information is protected by SSL/TLS encryption. Credit card data is handled exclusively by PCI-DSS certified operators.

12. Minors

The Website is not intended for individuals under 18 years of age. The Data Controller does not knowingly collect personal data from minors. Should such data be collected inadvertently, the Data Controller will proceed to its immediate deletion. Parents or guardians may contact the Data Controller using the details set out in Section 1.

13. Links to Third-Party Websites

The Website may contain links to third-party websites (partner booking platforms, social media, review sites). The Data Controller is not responsible for the privacy practices of such sites and invites users to review their respective notices before providing any personal data.

14. Updates

The Data Controller reserves the right to update this Notice at any time. The updated version will be published on the Website, indicating the date of last revision.

Last revision: November 2026 (version 2.1) – introduction of Section 6 on email tracking consent and update of Sections 3, 4, 7, 9 and 10.

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Document drafted in compliance with EU Regulation 2016/679 (GDPR) and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018.
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