

PRIVACY POLICY

Casa T srl (holding company of La Tuscia) understands and respects the importance of your privacy and we are committed to safeguarding your personal information. In providing our service to you, we must collect personal information from you and this policy outlines how we treat your personal data after it has been collected by any of our channels which include our website, call center and any future digital services or channels as they evolve. From 25 May 2018 onwards, you and your personal data will be protected by the EU General Data Protection Regulation (which is otherwise known as GDPR). We will only process your personal data as set out in our privacy policy or otherwise notified to or agreed by you or as we are otherwise permitted to do in accordance with data protection laws. You are responsible for ensuring that other members of your party are aware of the content of this Policy and consent to your acting on their behalf in all your dealings.

WHAT INFORMATION WILL WE COLLECT?

We collect personal data from and about you whenever you use our services, or if you are in touch with us in any way, whether this is directly or indirectly. You may, for example, make your booking or booking enquiry through a travel agent or you may provide personal information to a third party involved who are handling our Italian tourist requirements such as the police registration and the tourist tax arrangements, as well they do a quick background check to verify your identity in order for us to waive a security deposit otherwise required (not optional). We also collect data from publicly available sources (such as the Land Registry) which we use to profile clients internally for marketing purposes.

Examples of personal data which we might collect include (but are not limited to):

- names of all persons traveling
- a present date selfie
- contact details (such as telephone number, postal and e-mail addresses) of the person making the booking
- information in respect of any medical condition, disability or reduced mobility which may affect any person travelling – this comes within special categories of personal data (see below)
- your group composition; the ages of people in your group, their date of birth, gender, nationality, and passport information
- dietary information (which may disclose your religious beliefs)
- copies of documents such as passport or driver's license
- Credit/debit card data
- your feedback on our service, including from third parties
- CCTV footage used to keep our villas secure (perimeter focused and approved under Italian requirements)

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We will only collect personal information from you by specifically asking for it:

- when you confirm a booking or service through us
- when you subscribe to our newsletter
- when you register an account with us
- when you speak to any of our team
- when we use cookies (see our Cookies Policy below)

WHO MAY WE PROVIDE YOUR PERSONAL DATA TO?

Where you make a booking, appropriate personal data will be passed on to the relevant suppliers of your chosen arrangements (such as villa owners, caretakers, experience providers, cooks, car hire companies, restaurants and lidos) together with any other third party (such as banks and/or credit card companies) who need this information so that we can arrange for your holiday to be provided. The information may also be provided to government / public authorities such as customs or immigration if required by them, or as required by law. Certain information may also be passed on to security, property insurance or credit checking companies.

We may also make personal data available to other companies who provide services on our behalf, such as mailing brochures and marketing material.

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We only provide third parties with the personal data they require to deliver their services. Other than in relation to government / public authorities (over whom we have no control), we will take appropriate steps which are intended to ensure that anyone to whom we pass your personal data for any reason agrees to keep it secure, only uses it for the purposes of providing their services and does not collect any personal data from you in the course performing their services.

WHERE WILL WE PROCESS YOUR PERSONAL DATA?

We may also disclose information to organizations who act as "data processors" on our behalf, or to other organizations that perform business functions on our behalf, some of whom might be outside the EEA. These functions include administration, providing services (and contacting you when necessary), customer care, business management and property management platform and operation, re-organization/structuring/sale of our business (or our group companies), risk assessment, security and crime prevention/detection, research and analysis, marketing, monitoring, measuring, and assessing customer purchasing preferences and trends, dispute resolution, credit checking and debt collection.

PROTECTION OF DATA

We take appropriate technical and organizational measures to protect against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data, which is appropriate to the harm that might result from the unauthorized or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures.

USE YOUR PERSONAL DATA TO SEND INFORMATION ABOUT OUR HOLIDAYS OR OTHER SERVICES IN THE FUTURE

We will only retain and use your personal data for marketing purposes where you have specifically consented to our doing so or, in relation to e-mail marketing, where we comply with the Privacy and Electronic Communications Regulations 2003 (PECR). PECR permits us to send you e-mail marketing where you have previously provided us with your e-mail address while entering a contract with us for tour arrangements or negotiations for such arrangements and we wish to e-mail you marketing material about our similar services or products. You will of course be given the opportunity to opt out of receiving such e-mail marketing communications when you first provide us with your e-mail address and whenever we send you any e-mail marketing.

You may provide your consent by opting to receive marketing material either on-line or by telephone. You may also choose in what ways you are happy to receive communications from us. You may, for example, be happy to receive information and offers by post and e-mail but not by telephone.

CAN YOU WITHDRAW YOUR CONSENT TO OUR PROCESSING YOUR PERSONAL DATA?

If you do not agree to our use of the information as set out above, you should inform us as soon as possible by writing to us at Casa T srl, Strada Comunale 28 di Bagnolo, Località Starda, Gaiole in Chianti, 53013 (Si) Italy or by email at management@thetuscanyhomes.com. In accordance with the Data Protection Act 1998, you may ask us in writing for a copy of the information we hold about you and to correct any inaccuracies in your information. We aim to respond to you within 21 days from the date of request.

You can also choose not to provide us with some of the information we request, however as a result we may not be able to complete your arrangements.

Subscribers can opt out of receiving further information from us at any time. You will also be given a fast and easy option of opting out on all communications. Email us at management@thetuscanyhomes.com to unsubscribe.

HOW CAN YOU FIND OUT WHAT INFORMATION WE ARE HOLDING ABOUT YOU?

You are entitled to ask us (by letter or e-mail) what personal data of yours is being held or processed, for what purpose and to whom it may be or has been disclosed. No fee will be charged for responding to this request unless it is obviously unfounded or excessive or we have previously provided the same information. We promise to respond to your request without delay and in any event within 1 month unless the request is complex, or you have made numerous requests in which case we may be able to extend our response time by a further 2 months.

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WHAT SHOULD YOU DO IF THE PERSONAL DATA WE ARE HOLDING IS INACCURATE, OUT OF DATE OR INCOMPLETE?

If you believe this is the case, please tell us by e-mail as soon as possible. We will rectify the problem within 1 month or within 3 months if the rectification request is complex.

HOW LONG CAN WE RETAIN AND PROCESS YOUR PERSONAL DATA?

We will not process your personal data in a form which enables you to be personally identified for any longer than is necessary in order to fulfill the purpose for which it was originally collected or for any other legitimate business purpose.

Where your personal data has been provided for the purpose of the holiday arrangements or other services you have contracted, we are entitled to retain this data for a period of at 6 years after those arrangements have been completed. In certain limited circumstances, we may be able to retain it for a longer period.

If you have consented to receiving marketing communications from us, we may continue to use your personal data for this purpose until you withdraw your consent or otherwise for as long as we reasonably consider your consent remains valid and effective.

CANCELLATION OF PERSONAL DATA

You can ask us to erase your personal data in certain circumstances, for example where you have withdrawn your consent to further marketing material where the data in question has only been processed for this purpose. However, this is not always the case. Please see the previous paragraph for further information on the period we may retain personal data.

UPDATES AND CHANGES

From time to time, we may need to make changes to this privacy policy. These may be required because of changes in data protection laws or in the guidance issued by regulators such as the Information Commissioner's Office (which is usually referred to as the ICO) or where we make changes to our procedures. The latest version of this privacy policy can be found on our website www.thetuscanyhomes.com.

COOKIES

Our website uses cookies. A 'cookie' is a small data file which our website server stores on your computer (through your web browser) in order to recognize subsequent requests, remember certain information (e.g., search parameters, preferred language, login status) and to collect data (not personally identifiable) for site traffic and performance analysis.

We use cookies in a few different ways under following categories:

- Technical cookies (from our domain)

These are cookies that are used for the operation of our site. They include, for example, cookies that enable you to log into our sites, remember your settings, your cookies consent choice, keep search parameters data between subsequent sessions, keep history of pages visited to provide enhanced and more personal features and services.

- Targeting and performance cookies (from third-parties Google Analytics domain)

These completely anonymous and aggregated data, allow us to count visitors and to see how they move around our site and are also used to benchmark our web marketing campaigns.

You may, if you wish to do so, disable, or delete such cookies through your internet browser. However, doing so may mean you will be unable to access our website or parts of it, your experience of our website may be adversely affected. If you've used our website, we may use advertising on other websites and on social media sites and apps, to remind you about the services we provide based on your browsing.

COMPLAINTS ABOUT THE PROCESSING OF MY PERSONAL DATA

If you have any complaint about the way in which your personal data has been dealt with, please let us know by e-mail to management@thetuscanyhomes.com. We will investigate and respond to you as soon as we reasonably can.

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THE RESPONSIBLE OF THE DATA SERVICE

The responsible of the data service is Casa T srl, represented by Ellen Kruijning, Strada Comunale 28 di Bagnolo, Località Starda, Gaiole in Chianti.