



# VILLA PALESTRO

CONFERENCE CENTER

Gestione: GIAMA Congressi e Convegni

## Privacy Policy

Privacy Notice on the Processing of Personal Data Pursuant to Regulation (EU) 2016/679 of 27 April 2016 on the Protection of Natural Persons with Regard to the Processing of Personal Data (GDPR) and Italian Legislative Decree No. 196/2003 (Personal Data Protection Code)

## Introduction

**GIAMA Congressi e Convegni S.r.l.** is committed to respecting and protecting your privacy in accordance with the General Data Protection Regulation (GDPR) and the Italian Personal Data Protection Code.

This Privacy Notice explains in detail how the Company collects, uses, and manages your personal data through the website [www.villapalestro.it](http://www.villapalestro.it).

## Data Controller

The **Data Controller** is **GIAMA Congressi e Convegni S.r.l.**, with its registered office at **Via Palestro, 24 – 00185 Rome (RM), Italy.**

**Email:** [privacy@giamacongressi.net](mailto:privacy@giamacongressi.net)

## Categories of Personal Data Processed

Like all websites, this website automatically collects certain personal data whose transmission is inherent in the use of Internet communication protocols. These browsing data are collected by the website's IT systems and software procedures during their normal operation. They are not collected for the purpose of being associated with identified individuals. However, by their nature, they could allow users to be identified through processing and association with data held by third parties.

The data collected include IP addresses or domain names of the computers used by users connecting to the website, the URI (Uniform Resource Identifier) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (for example, successful completion or error), and other parameters relating to the user's operating system and IT environment.

These data are used exclusively to obtain anonymous statistical information on the



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use of the website and to ensure its proper functioning. They are deleted immediately after processing.

However, such data may be used to establish liability in the event of cybercrimes committed against the website.

### Data Provided Voluntarily by the User

The optional, explicit, and voluntary sending of emails to the address indicated on this website or through the dedicated contact form entails the acquisition of the sender's email address, which is necessary to respond to requests, as well as any other personal data voluntarily provided by the user in the communication.

Only with your specific and separate consent will your personal data be processed for marketing and newsletter purposes. This includes the sending of commercial communications and promotional material relating to our products and services via email, postal mail, SMS, and telephone.

Providing consent for such processing is entirely optional. You may withdraw your consent at any time, and such withdrawal will not affect the provision of the services you have requested.

### Cookie

Data collected through cookies or similar technologies are used to improve the functionality of the website, including authentication, session management, and the storage of visitors' settings and preferences, thereby enhancing the user experience.

The website also uses third-party cookies, which may be used to collect information about users' preferences in order to provide personalized advertising.

For further information, please refer to our **Cookie Policy**.

### Purposes of Data Processing and Legal Bases for Processing

| Purpose of Processing                                                                                                                                                                                       | Legal Basis for Processing                 | Data Retention Period                                                                                                      |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| We process personal data to manage and administer the Website, improve users' browsing experience, obtain anonymous statistical information on website usage, verify its proper functioning, and enable the | Article 6(1)(f) GDPR – Legitimate interest | Personal data are retained only for the time strictly necessary to optimize the website and allow the use of its features. |



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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| use of all website features.                                                                                                                                                                                      |                                                                                                                                                                            |                                                                                                          |
| We process personal data for purposes strictly connected and necessary to handle users' requests submitted through the Website via email or other communication channels.                                         | Article 6(1)(a) and Article 6(1)(f) GDPR – Consent (for requests submitted through the contact form) and legitimate interest (for telephone calls or other communications) | Personal data are retained only for the time necessary to manage communications relating to the request. |
| Marketing purposes through the use of third-party cookies that allow personalized advertisements to be displayed in order to promote similar services or services that may be of interest to the user.            | Article 6(1)(a) GDPR – Consent                                                                                                                                             | Personal data are retained for a period not exceeding 2 years.                                           |
| Marketing purposes through voluntary subscription to the newsletter in order to promote similar services or services that may be of interest to the user.                                                         | Article 6(1)(a) GDPR – Consent                                                                                                                                             | Personal data are retained for a period of 5 years.                                                      |
| Compliance with legal obligations established by laws, regulations, and applicable national and EU legislation, as well as provisions issued by legally authorized authorities or supervisory and control bodies. | Article 6(1)(c) GDPR – Legal obligation                                                                                                                                    | Personal data are retained only for the time strictly necessary to fulfil the legal obligations.         |
| Any purposes aimed at establishing, exercising, or defending a legal right in judicial proceedings.                                                                                                               | Article 6(1)(f) GDPR – Legitimate interest                                                                                                                                 | Personal data are retained only for the time strictly necessary to fulfil the purposes indicated.        |

Once the above-mentioned retention periods have expired, personal data will be destroyed, deleted, or anonymized, in accordance with the technical procedures for data deletion and backup management, and in compliance with the GDPR and applicable data protection legislation.



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#### Methods of Processing of Personal Data

Personal data are processed in compliance with the principle of data minimization, pursuant to Article 5(1)(c) and Article 25 of Regulation (EU) 2016/679.

This means that personal data will be processed lawfully and fairly, collected for specific and legitimate purposes, kept accurate and updated where necessary, and will be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

#### Obligation to Provide Personal Data

Your personal data may be disclosed to the following categories of recipients:

- **Third-party companies** providing the Data Controller with website maintenance, development, and general IT services, acting as **Data Processors**;
- **Third-party companies** involved in the installation of cookies, in accordance with the procedures set out in this website's Cookie Policy, acting as **Joint Controllers**;
- **Public authorities and supervisory and control bodies** that have access to personal data by virtue of legal or administrative obligations, acting as **independent Data Controllers**.

Furthermore, in order to pursue the purposes described above, your personal data may be accessed by third parties acting on behalf of the Company, such as companies, consultants, or professionals responsible for managing the information systems connected with the Company's activities.

These parties will process personal data as **external Data Processors** on behalf of the Company.

#### Authorized Individuals

Your personal data may be processed by employees or collaborators belonging to the company departments responsible for pursuing the purposes described above. These individuals have been expressly authorized to process personal data, have received appropriate training, and have been provided with suitable operational instructions for carrying out their assigned tasks



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#### Transfer of Personal Data Outside the European Union

Some data collected through cookies may be transferred to countries outside the European Union (including cookies from Google Analytics and Facebook). Such transfers are authorized on the basis of specific adequacy decisions adopted by the European Union and the Italian Data Protection Authority, in particular pursuant to the European Commission's Adequacy Decision C(2023) 4745 concerning the **EU-US Data Privacy Framework (EU-US DPF)**. The companies involved ensure their adherence to this framework.

#### Rights of the Data Subject

|                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Obtain confirmation as to whether or not your personal data are being processed and access your personal data, receiving information about the purposes of processing, the categories of data processed, the recipients, the retention period, the existence of automated decision-making processes, and transfers outside the EU/EEA, as well as a copy of the data ( <b>right of access</b> ); |
| Request the rectification or completion of inaccurate or incomplete personal data ( <b>right to rectification</b> );                                                                                                                                                                                                                                                                             |
| Request the erasure of your personal data where they are no longer necessary, have been unlawfully processed, or must be deleted due to a legal obligation, unless the processing is necessary for reasons of public interest or for the establishment, exercise, or defence of legal claims ( <b>right to erasure / right to be forgotten</b> );                                                |
| Obtain restriction of processing, meaning that your personal data will be retained but no longer used ( <b>right to restriction of processing</b> );                                                                                                                                                                                                                                             |
| Receive your personal data provided in a structured, commonly used, and machine-readable format and transmit those data to another Data Controller, where technically feasible, when the processing is based on consent or a contract ( <b>right to data portability</b> );                                                                                                                      |
| Withdraw your consent to the processing of personal data, where consent has been provided ( <b>right to withdraw consent</b> );                                                                                                                                                                                                                                                                  |
| Object to the processing of your personal data where the processing is based on the Data Controller's legitimate interest ( <b>right to object</b> ).                                                                                                                                                                                                                                            |

To exercise your rights regarding the processing of personal data, you may contact each of the Joint Controllers using the following contact details:

**Email:** [privacy@giamacongressi.net](mailto:privacy@giamacongressi.net)



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**Telephone number:** +39 06 492531

**Address:** Via Palestro, 24 – 00185 Rome, Italy

### Rights of the Data Subject

Data Subjects have the right to lodge a complaint with the competent Supervisory Authority if they believe that the processing of their personal data has been carried out unlawfully.

In Italy, the competent Supervisory Authority is the **Italian Data Protection Authority (Garante per la Protezione dei Dati Personali)**.

Further information on how to lodge a complaint is available on the Authority's website ([www.garanteprivacy.it](http://www.garanteprivacy.it)).

### Changes to the Privacy Notice

The Data Controller reserves the right to amend or update this Privacy Notice.

**Privacy Notice last update on 21 april 2026**