

## PRIVACY

### Privacy Policy

#### **General Data Protection Regulation (GDPR)**

*(Rule Ue 27 april 2016 n. 2016/679/UE)*

**Informativa ai sensi dell'art. 13 del D.lgs 196/03 - Codice sulla Privacy**

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This privacy notice discloses the privacy practices for Pitcher & Flaccomio Real Estate company and it's website [www.pitcherflaccomio.com](http://www.pitcherflaccomio.com). It will notify you of the following:

- What personally identifiable information is collected from you through the website, how it is used and with whom it may be shared.
- What choices are available to you regarding the use of your data.
- The security procedures in place to protect the misuse of your information.
- Our Cookie Policy
- Our Newsletter Policy
- How you can correct any inaccuracies in the information.

#### **Information Collection, Use, and Sharing**

We are the sole owners of the information collected from our real estate company Pitcher and Flaccomio and on this site. We only have access to collect information that you voluntarily give us personally, via email or other direct contact from you. We will not sell or rent this information to anyone without your permit.

We will use your information to respond to you, regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than as necessary to fulfill your request, e.g. to rent, purchase or manage an apartment, and to follow laws and regulations of the Italian State and European Community.

Unless you ask us not to, we may contact you via email in the future to tell you about events, specials, new products or services, or changes to this privacy policy.

#### **What do we mean by personal information?**

Personal information means details which identify you or could be used to identify you, such as your name and contact details, your rental arrangements and purchase history. It may also include information about how you use our website and/or mobile applications.

#### **When does this policy apply?**

This Privacy Policy applies to personal information about you that we collect, use and otherwise process in connection with your relationship with us as a customer or as a potential customer or as a member of our Management Service program, including when you book with us or use our other services –such as subscribe to our Newsletter- , use our websites or mobile apps, contact our offices or call center and book to use our services through third parties - such as travel agents and other real estate agents.

When we refer to other entities being data controllers within Section “Data Controller” or “Who do we share your personal information with?”, you should consult their own privacy policies for further information.

If you decide to hire additional services with us, such as making the Management Program or initiatives and events organized by Pitcher and Flaccomio together with third party collaborators, please take into account that further terms and conditions may apply.

### **When do we collect personal information about you?**

We collect personal information about you whenever you use our services - whether these services are provided by us directly or by other companies or agents acting on our behalf - including when you book or rent with us, when you use our website, or interact with us via email or mobile applications or use our office.

*Here are some examples of when and how information is collected:*

- When you rent or search for a property or apartment or service through email, phone on our website or app.
- When you rent a property or purchase a property through our other sales channels, such as a travel agent or real estate agent.
- If you join any of our Management Program, or when you register in our Newsletter.
- When you complete a customer survey to provide us with feedback.
- When you enter a contest or register for a promotion or if you choose to interact with us via social media such as Facebook or Twitter.
- When you click on one of our emails or navigate around our website. We may also gather information about how you found us on the internet and the sites you previously visited.

### **What types of personal information do we collect and retain?**

When you use our services you will need to provide us with your personal details and the details of those individual(s) who will be travelling and staying in the property or apartment.

We collect the following categories of personal information:

Information you provide in order for Pitcher and Flaccomio to complete and manage a booking you have made with us or a service you have requested from us.

1. *Examples:* Your name, address, email, contact details, date of birth, gender, passport or other national ID number, your account details and payment information.

If you book a property for someone else we may collect your billing information but may communicate with the clients directly about their booking.

We will know whether you have made your booking at [www.pitcherflaccomio.com](http://www.pitcherflaccomio.com) or in any other sales channel such as a travel agency, other real estate agent or our contact center.

Information collected during your stay with us

- *Example:* We may collect information such as your interactions with our personnel and neighbors of the property before and during your stay.
- *Example:* We will collect information of individual(s) who will be travelling and staying in the property or apartment with you for ant terrorist law and city council rules.

Information about your travel arrangements

- *Example:* Details of your booking, travel itinerary, details of any additional assistance you require and other information related to your travel, such as time schedule preferences or physical assistance requirements.

Information about the services we have provided to you in the past

- *Example:* Details of your previous booking arrangements, such as your previous stay or property and stay-related issues, including problems in the property, your personal requirements, luggage incidents or lost items and your customer feedback.

Information about your online logins and other interactions.

- *Example:* We will retain your data to guarantee our correct interaction with you.
- *Example:* The website will recall the previous houses or properties you have viewed.

We will retain your information when you have taken part in any of our contests or promotional initiatives, or when you have interacted with us through social networks such as Facebook or Twitter. Information about your use of our websites, contact center and mobile applications

- *Examples:* To help us customize your personal information and to improve our website we use “cookies” and other similar technologies and collect information about your searches and the contents you have visited on our website, such as what website you are surfing from, or the banner advertisements or links appearing in our marketing partners’ websites.

We will use the information gathered in the cookie to better understand you as our customer. This information may include, if you have fed it into our website, information on a previous booking or a clients name in the case these data were linked to your personal profile in our Management Program.

From your use data we may learn that you have visited [www.pitcherflacomio.com](http://www.pitcherflacomio.com) and searched for a property, but you have not made your reservation yet. We might use this information to contact you and offer you further information on this property you might be interested in or other properties that we feel may fit your requirements.

### **When and why do we collect ‘sensitive personal data’?**

Certain categories of personal information, such as that about race, ethnicity, religion, health, sexual orientation or biometric data are considered “sensitive personal data” requiring an additional level of protection under European Union data protection law. In Pitcher and Flacomio we generally try to limit the circumstances where we collect and process sensitive personal data.

*These are examples on circumstances where we might need to collect and process sensitive personal data:*

- You have requested Pitcher and Flacomio, or a colleague a specific medical assistance from us, such as the provision of wheelchair assistance.
- You have sought a particular property or apartment that is fitted for wheelchair and/or wheelchair users.
- You have otherwise chosen to provide such information to us or it has been passed onto us by a third party such as the travel agent, or real estate agent through which you made your booking. It may also happen that you have requested a particular type of property –such as a wheelchair accessible- which may imply or suggest you hold particular health or medical condition.

### **What do we use your personal information for and under what legal basis do we use it?**

The main purposes for which we use your personal information are:

Based on our contractual relationship with you, to fulfill your booking and rental or purchase arrangements and deliver the service you have asked for

- *Example:* We will need to use your name, address, email, contact details, date of birth, gender passport or national ID information, and payment data and information so that we can process your bookings, fulfill your rental arrangements, collect consideration for our services, provide information required by relevant authorities – such as tax, anti-money laundry laws, anti-terrorist laws, custom or immigration authorities - and so that Pitcher and Flacomio knows who is booked and staying in a Property.

Based on our contractual relationship with you, to send status update and operational and servicing communications to you, no matter the channel you may have booked our services through – whether direct email, phone or through the web site or other agent, online or face to face.

- *Example:* You may receive a notice from us to inform you that the check-in in the property will be delayed, or is already possible, or on any changes affecting the services you hired with Pitcher and Flaccomio or with other services that Pitcher and Flaccomio may have any type of booking agreement with.

Based on the fulfillment of our legal obligations, to deal with immigration, rentals of properties and entry/exit requirements with a State territory (ant-terrorism law) and to meet certain legal any regulatory requirements which apply to Pitcher and Flaccomio as a Real Estate company.

- *Example:* As Real Estate company there are regulatory obligations on Pitcher and Flaccomio to maintain a record of the names of clients that rent a particular property or apartment.
- *Example:* We are obliged to fulfill the antiterrorist law (191\78) communicating to the Italian authorities your personal information.

Finally, fighting against fraud and major crimes such as terrorism or Arms, drugs, smuggling of people, money laundry, require that Real Estate agents respond to information requirements from the competent law enforcement and security corps within the Italian state where we operate.

Based on our legitimate business interest, to provide services tailored to your requirements and to treat you in a more personal way.

- *Example:* We may personalize the experience you have while renting with us.

Based on our legitimate business interest, to carry out analysis and market research

- *Example:* We will analyze the way in which our sales channels, products and services are being used by customers so that we can understand how to improve the service we offer.

Based on our legitimate business interest, to carry out direct marketing and keep you informed of Pitcher and Flaccomio products and services that better suit your needs and preferences, in our understanding

- *Example:* We may send to you information on our products and services by email.

We may adapt our apps, website, emails and other communications to guarantee they are of your highest interest –including, for example, promotions or services related to your recent or historic rental properties or similar ones.

To better understand your renting preferences and your needs when you rent through us.

If you are a member of the Newsletter or Management program, and based on your consent previously granted for such a purpose to carry out direct marketing by electronic means and to keep you informed on Pitcher and Flaccomio's products and services that better suit your needs and preferences, in our understanding, as well as to send you tailored electronic marketing communications on products and services and/or from our partners.

Based on your consent previously granted for such a purpose we may record telematic communications and instructions whenever you are using any email centre or sales service from Pitcher and Flaccomio, and in such cases we will process your personal information, including your voice when you address us through these channels, to provide evidence of the transactions performed for any relevant legal purposes.

Based on our legitimate business interest, to improve our website, products and services

- *Examples:* We may monitor how you and other clients browse our website so that we may identify ways to improve your browsing experience with us.

We may also invite you to take part in surveys to learn more about your level of satisfaction with our service, your booking experience with Pitcher and Flaccomio and the use of our services.

If you are a member of the Management program, and based on your consent previously granted for such a purpose we may also send to you surveys to learn about your satisfaction with the program, its offers and promotions and/or the services and products offered by our partners.

Based on our contractual relationship with you, to manage transactions, operations, hiring or products and services by any means or channels, or to solve any type of query, complaint, claim or recommendation you may have posed.

Based on the fulfillment of our legal obligations, as applicable, we may use your personal information for management and administrative purposes

- *Example:* We may use and retain your personal information, including your purchase history, for administrative purposes, which may include for example, accounting and billing, auditing, credit or other payment card verification, anti-fraud screening (including the use of credit reference agency searches, crosschecking information with financial entities and other electronic payment entities, and payment card validation checks) and systems testing, maintenance and development.

### **How long do we keep personal information?**

We will keep your information for as long as we need it for the purpose it was collected, unless you request us to delete it and in such a case provided that Pitcher and Flaccomio has no longer the need to keep your information for other reasons.

- *For example,* where you book a property with us we will keep the information related to your booking so we can fulfill the specific booking arrangements you have made and after that, we will keep the information for a period which enables us to handle or respond to any complaints, queries or concerns relating to the booking. The information may also be retained so that we can continue to improve your experience with Pitcher and Flaccomio.

We will actively review the information we hold and either delete it securely when there is no longer a legal, business or customer need for it to be retained; or in some cases anonymize it in order to keep using it for administrative or statistic purposes or to develop generic profiles and segmentations that help us learn more about our types of customers in general and their relevant needs and preferences.

Please note that when we have collected the personal information based on your consent and you withdraw such consent, or in the cases where you exercise your right to suppress your personal information we may still to keep the information blocked and available to courts, tribunals and other relevant authorities for the minimum term established by law in each particular case and in order for Pitcher and Flaccomio to meet its responsibilities arising from processing your data; Pitcher and Flaccomio has, in any case, the possibility of retaining your Personal Data for the period allowed by Italian law to protect its interests (art. 2947 (1) (3) of the Italian Civil Code).

### **Who do we share your personal information with?**

We might share your personal information with other companies such as other real-estate companies, travel agents or other companies that could help us find and succeed in offering you the services and properties you are looking for.

We share information with these companies so they can assist us in providing services and properties to you.

- *For example:* if you have book and stayed in a property or apartment represented by a third company or real estate agent, any of them we may use this information to understand more about the sorts of booking services you are likely to be interested in.
- *For Example:* you own a property or apartment that we represent and we share the information with third company or real estate agent who represents the tenant or the buyer.



You will only receive marketing from other Companies where you have provided your consent to each of these companies to do so.

We may also disclose your personal information to the following third parties for the purpose described here:

Custom or migration authorities. Pitcher and Flaccomio and the rest of real estate agencies are mandated by the laws of the EU, USA and other countries to provide access to information on bookings and rentals of properties located in Italy to their relevant border control and custom authorities.

Pitcher and Flaccomio follows strict requirements for hiring and collaborating with other travel agents or real estate agents in order to fulfill its obligations on data protection and commits itself with each of its suppliers a personal data processing agreement which each supplier will apply adequate technical and organization measures; to process personal data for the agreed purposed exclusively and to observe Pitcher and Flaccomio instructions.

- *Examples:* If you book through Pitcher and Flaccomio website to rent a property that is represented through another real estate agent or travel agent we will submit to this third company all the relative information they need to fulfill such booking.

Credit and charge card companies, credit reference agencies and anti-fraud screening service providers in order to process payments and (where necessary) to carry out fraud-screening

- *Example:* you decide to rent a particular property or apartment so to process your booking we would need a down payment that you will process using your credit card through our secure webpage, or through our physical POS system in our office

In response to a valid, legal request from Government and law enforcement agencies such as customs and immigration authorities, or security forces in charge of fighting against fraud and major crimes. Please bear in mind that, for control and safeguard of public security reasons and for such purposes, Pitcher and Flaccomio may transmit your data as a tenant to the Homeland Authorities of Italy.

Such information maybe delivered to other countries, that by laws regulations and agreements, may require this information be delivered.

Third party service providers we are using to provide services that involve data processing, for example, to carry out marketing initiatives or run customer surveys on our behalf

Third parties, such as law firms and law courts, in order to enforce or apply any contract with you

Third parties, such as the police and regulatory authorities, to protect our rights, property, or the safety of our customers, staff and assets.

If necessary to comply with a legal or regulatory obligation in any jurisdiction, including where that obligation arises as a result of a voluntary act or decision by us

We do not sell or release personal information to third parties, and we only allow third parties outside Pitcher and Flaccomio to send you marketing information where we have your permission to do so.

### **What countries will your personal information be sent to?**

Your personal information may be sent to and stored by us and third parties in countries outside the country in which you are located and outside the European Economic Area. This occurs in the course of abiding to laws and regulations in any jurisdiction, as this transfer is necessary for your use of the service, it is justified under art. 49(1)(b) of the GDPR, according to the current privacy law.

- *Example:* Based on the fulfillment of our legal obligations, to properly manage emergency, wreck or force majeure situations we may need to transmit your personal information to different kind of people, companies or entities whose help is essential for Pitcher and Flaccomio in such cases.

Likewise we may have to transfer your personal information to third parties located outside your country in order to allow such third parties deliver services and products you have requested us for.

- *Example :* you requested to book a property where the owner of the property, that needs to sign the rental contract, is residing outside the European Economic Area.
- *Example:* you are the owner or a property or apartment where the tenant resides outside your country and the European Economic Area, and needs a copy of the rental contract for Visa Entry purposes
- *Example:* you want to subscribe to our Newsletter program which is serviced by a third party (www.mailchimp.com) outside the European Economic Area.

### **Your Access to and Control Over Information**

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us via the email address or phone number given below or on our website:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you if permitted.
- Express any concern you have about our use of your data.

### **Security**

We take precautions to protect your information. When you submit sensitive information via the website, your information is protected both online and offline.

Wherever we collect sensitive information (such as credit card data), that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a lock icon in the address bar and looking for "https" at the beginning of the address of the payment system Web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

### **Information and Availability forms**

We request information from you on our forms. To check for the availability of a particular property from us, you must provide contact information (like name and email address) and personal information (like dates of travel, number of people). This information is used for checking the availability purposes and to respond to your enquiry. If we have trouble processing an enquiry, we'll use this information to contact you.

### **Social media**

Pitcher and Flaccomio may hold accounts on different social media in order to promote its services and may, through the provider of such services, access certain information about the user, which the user has previously agreed to share through said media. Pitcher and Flaccomio may use the data gathered through its social media accounts to create segmented advertising campaigns, competitions, prize draws and promotions in accordance with the conditions and privacy policy specific to each social media. Through its Website, Pitcher and Flaccomio may offer users services that will be rendered by third parties, such as properties represented by other real estate agencies, car hire, luggage transportation or other related services. Users who book such services must accept each service provider's terms & conditions and privacy policy, whereby Pitcher and Flaccomio shall not be held liable for the services nor for data provided voluntarily by the user.

### **Cookies policy**

Cookies policy for Pitcher and Flaccommio Sole Proprietorship website. We inform you that on [www.pitcherflaccommio.com](http://www.pitcherflaccommio.com) we use cookies with the goal of improving the use and web browsing and to improve their quality according to the users' browsing habits and styles.

## **What are cookies?**

Cookies are small data files which are generated on the computer, Smartphone, tablet or any other device of the User when accessing a webpage and which allows the owner of webpage to store or recover certain information about browsing performed from the equipment.

## **Type of cookies**

This website doesn't use profiling cookies, but only technical browsing or session cookies strictly necessary for operation of the Site or to enable the user to use the contents and services requested by the latter.

Analytics cookies, which enable the system to understand how the site is used by the users. In the case of these cookies, no information on the user ID is collected, or any personal data. The information is processed in aggregate and anonymous form.

*Example* : the most viewed property or apartment, the subject of most interest

Function cookies, i.e. cookies used to activate specific site functions and a selected set of criteria (for example language, products selected for purchase) for the purposes of improving the service provided to the user.

*Example*: the language setting of the website, the properties that you have seen on previous sessions

You can select which first-party cookies to authorize via the relative procedure set up in this page, and can also authorize, block or delete (totally or in part) the cookies via the specific functions in your browser.

In the case of technical cookies, which do not require express consent for their use, the Italian Data Protection Authority (see Provision Identification of simplified methods for information consent and the acquisition of consent for the use of cookies of 8 May 2014, hereinafter referred to as "Provision") also includes:

- "analytics cookie" where used directly by the site manager to collect information, in aggregate form, on the number of users and how the latter visit the site itself;
- browsing or session cookies (for login);
- function cookies, which enable the user to browse a site according to a selected set of criteria (for example language, products selected for purchase) for the purposes of improving the service provided to the user.

On the contrary, "profiling cookies" that are not used on this website, i.e. those used to create user profiles and used to send advertising messages in line with the preferences outlined by the user while browsing on the network, required specific consent from the user.

## **How to deny consent for use of cookies?**

A user who continues navigating on our websites (closing the information banner or accessing any content on the underlying page) accepts the use of any cookies which may be installed by the website on their terminal equipment. All users may, however, at any time deny access and block use of cookies:

1. The User may exercise the right to block tracking according to information given in the privacy policy of the third party, using the opt-out link if expressly provided, or by directly contacting the third-party operator;
2. Or by changing their own browser settings.



Please note that full deactivation of technical cookies by the user may compromise the use of various functions on our websites and, in some cases, result in complete impossibility of navigating on the websites. However, disabling non-technical cookies does not prejudice use of our websites. Below, we provide instructions for the management of cookies with reference to the main browsers in use.

- Microsoft Windows Explorer: <http://windows.microsoft.com/it-it/windows-vista/block-or-allow-cookies>
- Google Chrome: [https://support.google.com/chrome/answer/95647?hl=it&p=cpn\\_cookies](https://support.google.com/chrome/answer/95647?hl=it&p=cpn_cookies)
- Mozilla Firefox: <https://support.mozilla.org/it/kb/Attivare%20e%20disattivare%20i%20cookie?redirectlocale=en-US&redirectslug=Enabling+and+disabling+cookies>
- Apple Safari: [https://support.apple.com/kb/PH19214?viewlocale=it\\_IT&locale=en\\_US](https://support.apple.com/kb/PH19214?viewlocale=it_IT&locale=en_US)

3. use online resources such as:

- <http://youonlinechoices.eu/>
- <http://optout.aboutads.info/>
- <http://www.youonlinechoices.com/>

CAUTION: deleting the technical and/or function cookies of the Site could make it impossible to browse or render unavailable certain services or functions of the Site, causing some malfunctions, in which case the user would be obliged to modify or manually enter some information or preferences each time he/she visits the Site.

### **Below we offer information about the types of cookies and their purpose:**

1. Types of cookies according to the entity which manages them:

According to which is the entity managing the equipment or domain from where the cookies are sent and where the data obtained is treated, we can distinguish:

Own cookies: These are the ones that are sent to the user's terminal from [www.pitcherflacomio.com](http://www.pitcherflacomio.com).

Third party cookies: These are cookies which are sent to the user's terminal from equipment or a domain which is not managed by Pitcher and Flacomio, but by another entity which treats the data obtained through the cookies. As these are third parties which proceed with implementing the cookies, blocking and uninstalling the cookies is regulated by the third party's specific conditions and mechanisms.

Google Analytics: This website uses Google Analytics, is a website analysis service provided by Google Inc. ("Google"). Google uses the personal data collected (user data) with anonymized IPs for the purpose of tracking and examining use of the websites, compiling reports and sharing them with other services developed by Google, so it is possible that cookie from Google are installed, but all your personal information and details that is sent back to Google Analytics has been "anonymized".

The IP address is anonymized by abbreviation of Users' IP addresses within European Union Member States or other countries in the European Economic Area. Only in exceptional cases is the IP address sent to Google servers and abbreviated in the United States through the function *ga('set', 'anonymizeIp', true)* – that hides an considerable portion of your IP address, which enable the system to understand how the site is used by the users.

In the case of these cookies, no information on the user ID is collected, or any personal data. The information is processed in aggregate and anonymous form.

You can opt out of the service using the following link: <http://tools.google.com/dlpage/gaoptout?hl=en>

Google AdWords conversion tracking: Google AdWords conversion tracking is a statistical service provided by Google Inc. which connects anonymized data from the Google AdWords adverts network to actions performed on the website. The website use data is collected.

The data collected is processed in the United States of America; for further information please refer to the following Privacy:

- Google Analytics Policy - <https://support.google.com/analytics/answer/6004245?hl=en>
- Google Policy - <https://policies.google.com/technologies/cookies?hl=en>
- Policy: <http://www.google.com/intl/en/policies/privacy/>

## 2. Types of cookies according to the length of time that they remain active on the terminal

**Session cookies:** These are a type of cookie designed to gather and store data while the user accesses a webpage. These cookies are stored on the terminal until the user's browsing session finalizes.

**Persistent cookie:** These are a type of cookies in which data continue to be stored on the terminal and can be accessed and treated for a definite period by the entity responsible for the cookie, and this can last from some minutes to several years.

## 3. Types of cookies according to their purpose

**Technical cookies:** These are the cookies which allow the user to browse the website or the platform and to use the different options or services existing there such as, for example, controlling the traffic and communication of data, identifying the session, accessing restricted access areas, using security elements while browsing or storing contents for the dissemination of videos or sounds or sharing content through social networks such as Twitter, Facebook, Google+ or Youtube. These can be session and persistent cookies.

**Personalized cookies:** These cookies allow the user to access the service with some predefined characteristics according to a series of criteria in the user's terminal such as, for example, the type of browser used to access the service, the regional configuration from which the service is accessed, etc.

**Analytical cookies:** These cookies allow us to quantify the number of users and also perform measurements and statistical analyses on our users' use of our website. To do so, the browsing on our website is analyzed with the goal of improving it.

You can allow, block or delete cookies installed on your equipment through the configuration of options on your internet browser. In the case that you do not allow cookies to be installed on your browser it is possible that you cannot access some services and that your experience on our website can become less satisfactory.

### **Consent of Cookie use**

Pitcher and Flacomio may modify this Cookies Policy according to regulatory or legislative demands, or with the goal of adapting this policy to the instructions dictated by the Italian or European Data Protection Agency. In the case that significant changes occur in this Cookies Policy, this will be duly communicated to the Users. By browsing and continuing on our website you indicate to us that you are consenting to the previously announced use of cookies, and in the conditions contained in the present Cookies Policy.

### **Links to other websites**

From the time that installation of Cookies and other tracking systems operated by third parties through the services used on this website cannot be technically controlled by the Data Controller, all specific references to Cookies and tracking systems installed by third parties must be considered as being for information only. To obtain detailed information, please consult the privacy policy of any third-party service listed in this document.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## Social network cookies

These services allow interaction with social networks or other external platforms directly from the pages of the website. The interactions and the information acquired by this website are in any event governed by the privacy settings of the User for each social network. If a service for interaction with social networks is installed, it is possible, even if users do not use the service, for it to collect traffic data for the pages in which it is installed.

LinkedIn social widgets and button: the LinkedIn social widgets and button are services for interacting with the LinkedIn social network, supplied by LinkedIn Inc. Data is collected on use of the websites visited. The data collected is processed in the United States of America; for further information please refer to the following Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

The Tweet button and Twitter social widgets: the Tweet button and Twitter social widgets are services for interacting with the Twitter social network, supplied by Twitter Inc. Data is collected on use of the websites visited. The data collected is processed in the United States of America; for further information please refer to the following Privacy Policy: <http://twitter.com/privacy>

The Facebook Like button and social widgets: the Facebook "Like" button and social widgets are services for interacting with the Facebook social network, supplied by Facebook Inc. Data is collected on use of the websites visited. The data collected is processed in the United States of America; for further information please refer to the following Privacy Policy: <http://www.facebook.com/privacy/explanation.php>

## Newsletter Policy

By checking the box, you declare that you are over 13 years of age and you authorize Pitcher e Flaccomio, to process your data in order to take part in the promotion and send you personalized information and marketing messages, mainly by electronic means, regarding our products, services, promotions and other information that may interest you.

By checking the box, you also authorize us to send you, via our newsletter, information about products and services of partners (like other Real Estate agencies, hotels and others) who work in other sectors, particularly the following: finance, insurance, hire and sale of vehicles, hotels, travel agencies, tour operators, restaurants, tourism, sport and leisure, all connected to air travel.

You also authorize us to use the data we collect when you browse, or your preferences, to adapt the content of our websites, apps, emails and other communications, and send you personalized offers and promotions that adapt to your user profile, so they are more useful and relevant to you.

We might share your personal information with other companies, outside the European Economic Area, so to be able to send you this newsletter, as currently it is managed by an external provider [www.mailchimp.com](http://www.mailchimp.com). We do not sell or release personal information to third parties, and we only allow third parties outside Pitcher and Flaccomio to send you marketing information where we have your permission to do so.

For more information we invite you to read the Privacy Policy of mailchimp, that you can find here : <https://mailchimp.com/legal/privacy/>

We may combine anonymous data from client-provider relationships with third parties (e.g. Google or Facebook) so that both companies can get to know more about user behavior like other visited websites.

Your data will be kept until you ask us to be removed by our mailing list and that you don't want to receive further our newsletter; if you want to unsubscribe and not receive any more newsletters, you can do so through the link provided for this purpose in each message we send by email.

The legal basis for processing your data is the consent you have given by checking the aforementioned box.

## **Legal basis and mandatory or optional nature of the processing**

The legal basis of the processing of Personal Data for the purposes referred to is art. 6 (1) (b) of the GDPR, since processing operations are required in order to provide the services as per contract. The provision of Personal Data for these purposes is optional, however, failure to provide them would imply the inability to initiate the requested Services.

Once Personal Data are provided, the processing may indeed be required to comply with legal obligations Pitcher and Flaccomio will be subject to.

Processing operations carried out for the marketing purposes described and for disclosing to third parties are based on the granting of your consent pursuant to art. 6 (1) (a) of the GDPR. The provision of your Personal Data for these purposes is entirely optional and does not affect your use of the Services. The processing activities performed for the purposes of e-mail marketing on products or services similar to those purchased by you, find instead its legal basis, pursuant to art. 6.1.f of the GDPR, in the legitimate interest of Pitcher and Flaccomio to promote its products or services in a context in which the data subject can reasonably expect this type of processing, and which s/he can oppose at any time. Indeed, if you refuse to have your data processed for marketing purposes, you can at any time do so by sending a request at [info@pitcherflaccomio.com](mailto:info@pitcherflaccomio.com), or through the link at the bottom of the upon referred email e-mail. The profiling processing is based on the legitimate interest of the Data Controller, pursuant to art. 6.1.f. of the GDPR, to personalise its commercial communication and is grounded as well in the legitimate interest of the Data Controller to detect fraud and scams committed against it in accordance with art. 6(1)(f) of the GDPR.

## **Data subjects' rights**

You are entitled to request Pitcher and Flaccomio at any time to access your Personal Data, correct, erase or object to their processing in the cases provided for by art. 20 of the GDPR; you are entitled to request the processing limitation in the cases under art. 18 of the GDPR.

You have the right to know: a) the origin of your personal data; b) why your data is collected and how it is processed; c) the ways the data is processed d) the names and data and contact details of who is collecting your data and who is processing it as per art 5, section 2; e) the third parties to whom your data could be communicated or the authorities to whom your data could be transmitted as representatives of the Italian State.

You have the right to have: a) the update, change or, when you have the interest, the integration of your data; b) cancellation or the anonymization or block of your data if operated in violation of rules or laws, included the data is not anymore necessary to be processed for the purposes of the services rendered; c) communications regarding points a) and b) for their content, of the parties of whom the data has been collected and processed, with the exception of the case such communications require and amount of work that is clearly above the scope of such right.

You have the right to oppose in all or in part: a) for legitimate reasons to the processing of your personal data even if such processing is within the scope of the service you have asked for; b) the processing of your personal data for the purposes of marketing and advertising or direct sales, or for marketing search or communications

In any case, you will always be entitled to file a complaint with the competent supervisory authority (the Italian Data Protection Authority), pursuant to art. 77 of the GDPR, if you believe that the processing of your data violates applicable law.

## **How Pitcher and Flaccomio treat personal data of children?**

The services offered by Pitcher and Flaccomio are not directed at children under 18 years old. For children younger than 18 years old, the use of any of our services is only allowed with the valid consent of a parent or a guardian. Pitcher and Flaccomio may collect and use information of children only as provided by the parent or guardian or with their consent. If we become aware that we process information of a child under 18 years old without the valid consent of a parent or guardian, we reserve the right to delete it.

## **Controller of Personal Information**

The controller is Pitcher e Flaccomio, Partita Iva n. 05225880422, in the person of its legal representative  
Corso Flaccomio

*If you feel that we are not abiding by this privacy policy, you should contact us immediately via telephone at 055 2343354, via mail Pitcher e Flaccomio, Lungarno della Zecca Vecchia 30, 50122 Florence, Italy or via email: [info@pitcherflaccomio.com](mailto:info@pitcherflaccomio.com)*

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