

PRIVACY POLICY

Information pursuant to Article 13 of the European Regulation 679/2016 (GDPR - General Data Protection Regulation)

This privacy policy (the “Policy”) explains how your personal data is collected and processed by Cascata Otro Srl (“Cascata”) when you use its website at: <https://cascatadotro.com/>.

This Policy applies to all interactions with the Website, including browsing and accessing our social media pages, as well as to related communications. Additionally, it applies to any other communications that contain a link to this Policy and to any interactions with us where you are specifically directed to this Policy.

Throughout this Policy, we refer to the Website, its functionalities, our social media pages, and related communications collectively as the “Services”.

This Policy does not cover the processing of personal data carried out through the third-party online booking platform accessible via a link on this Website. That processing is governed by a separate privacy policy applicable to that platform, which we encourage you to review before making a booking.

DATA CONTROLLER

The Data Controller is Cascata Otro Srl, having its registered office at Località Miniere n. 9, 13021 Alagna Valsesia (VC), Italy, bearing Tax Identification and VAT No. 02802340022, reachable via email at [REDACTED].

PROCESSED DATA

When you use the Services, we collect and process the following types of data that enable identification as an individual or relate to you as an identifiable person (“Personal Data”):

- IP address and device/browser information, collected automatically via cookies (see Cookie section below);
- Usage data relating to your interaction with the Website; and
- Name, telephone number, social media account ID, and profile picture, where you choose to contact us via WhatsApp.

All of these data types are collectively referred to as “Data” throughout this Policy.

LEGAL BASIS AND PURPOSE OF PROCESSING

Purpose of Processing	Legal Basis
Ensuring the functionality of the Services, including allowing access to the Website, social media pages and applications	Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Analysing and improving the performance of the Services and quality control	- Article 6 paragraph 1 a of the GDPR: with consent of the Users - Article 6 paragraph 1 c of the GDPR: to the extent necessary for complying with a legal obligation

	- Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Providing customer service, including responding to requests for information and complaints	- Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Analysing Data for preparing company reports and improving/ensuring customised services	- Article 6 paragraph 1 c of the GDPR: to the extent necessary for complying with a legal obligation - Article 6 paragraph 1 f of the GDPR: pursuing a legitimate interest of the Data Controller
Establishing, exercising or defending a legal right	- Article 6 paragraph 1 f of the GDPR: legitimate interest of the Controller

Commented [NN1]: To add as a purpose: "Responding to inquiries or requests for information and contact form submissions", if there is a contact form or direct email link on the "Contacts" page. TBC.

Commented [NN2]: To add as a purpose: "Responding to inquiries or requests for information and contact form submissions", if there is a contact form or direct email link on the "Contacts" page. TBC.

NATURE OF DATA PROVISION

Providing your Data for the purposes mentioned above is generally optional. However, certain Data may be necessary to provide specific Services you request. We will indicate mandatory fields in our forms with an asterisk (*). If you choose not to provide Data marked as mandatory, we may not be able to provide the related Services.

DATA RECIPIENTS OR POSSIBLE CATEGORIES OF DATA RECIPIENTS

Your Data will be processed by the Data Controller and by the persons strictly authorised by it to process the Data.

Your Data may be disclosed to the following categories of third-party recipients:

- External natural and/or legal persons that the Data Controller may engage to support or facilitate the Services and that are authorised to process the Data as a data processor under a specific agreement with the Data Controller (GDPR Article 28), or as autonomous data controllers (GDPR Article 4, paragraph 1, no. 7), also by virtue of the law;
- Parties to whom such communication must be made in order to fulfil or require the fulfilment of specific obligations laid down by laws, regulations and/or national and EU legislation, such as public agencies and other public authorities; and
- Other subsidiaries and/or associates and/or affiliates of the Data Controller.

DATA TRANSFERS TO THIRD COUNTRIES OR INTERNATIONAL ORGANISATIONS

In managing our relationship with you, we may need to transfer your Data to countries outside the EU and/or to international organisations to achieve the purposes of the processing. In such cases, we will adopt and implement all appropriate security, protection and confidentiality measures to safeguard the Data in compliance with the applicable data protection regulations.

RETENTION PERIOD

Your Data will be kept only for as long as necessary to achieve the purposes for which it was collected and, thereafter, for the term provided by any applicable regulation.

To determine the retention period, we consider the following:

- We retain Data for the period of time during which we have a contractual relationship (if any) with you and/or during which we provide the relevant Services (e.g. as long as you have an account on the Website or use our Services);
- We check whether archiving is necessary depending on our legal situation (e.g. with regard to limitation periods, procedures or checks by authorities); and
- We check whether we are obliged by applicable law to retain the Data for a further period (e.g., in the case of purchase transactions, we may be obliged to keep records of your transactions for a certain period of time).

DATA SUBJECT RIGHTS AND HOW TO EXERCISE THEM

You may, in any case and at any time, exercise the following rights:

- Request access to your Data, rectification or deletion of your Data, restriction of the processing, and portability of your Data under Articles 15-20 of the GDPR and/or object to the processing of your Personal Data via e-mail by writing to us at [REDACTED].
- Lodge a complaint with the Italian Data Protection Authority (see website: www.garanteprivacy.it).

EXISTENCE OF AN AUTOMATED DECISION-MAKING PROCESS

The processing does not involve any automated decision-making processes.

COOKIE MANAGEMENT AND NOTICE

A cookie is a small, simple file that is sent along with pages of this Website and stored by your browser on the hard drive of your computer or another device. The information stored therein may be returned to our servers or to the servers of the relevant third parties during a subsequent visit.

Cookies can be:

- first-party cookies, i.e., cookies installed directly by the Data Controller; and/or
- third-party cookies, i.e., cookies from sites or web servers other than the one hosting this Website, used for purposes specific to those third parties.

The Data Controller has read and applies the provision of the Italian Data Protection Authority “Identification of simplified methods for the provision of information and acquisition of consent for the use of cookies” of 8 May 2014 - [web doc. no. 3118884] (Published in the Official Gazette no. 126 of 3 June 2014) and the European Data Protection Board Guidelines 5/2020 on consent under Regulation 2016/679.

In this regard, we apply the Cookie Policy that can be found hyperlinked herein.

Commented [NN3]: Hyperlink lubenda Cookie Policy.