

## PRIVACY POLICY OF THE WEBSITE WWW.VILLASROCADELCARIBE.COM

LA MAGNIFICA ROCA DEL CARIBE SOCIEDAD DE RESPONSABILIDAD LIMITADA explains, on this page, how it processes the data of users who visit its site and how the cookies that are installed by the site act.

This Privacy Policy is made in compliance with Article 13 of the GDPR 2016/679 (General Data Protection Regulation, European Data Protection Regulation), the Privacy Guarantor's Guidelines of June 10, 2021, the EDPB Guidelines 5/2020 referring to consent, the ECJ Judgment October 1, 2019 C-673/17, the General Measure of the Privacy Guarantor on Cookies of May 8, 2014, no. 229, the "Working Document 02/2013 providing guidance on obtaining consent for cookies," WP 29 Opinion No. 4/2012 On Cookie Consent Exemption, Directive 2002/58/EC, and Recommendation No. 2/2001 of the Working Group Article 29.

The following applies only to the site [www.villasrocaedelcaribe.com](http://www.villasrocaedelcaribe.com); the Data Controller is not responsible for the data entered and cookies installed by other sites that may be consulted through links.

### Information about the data controller and data protection officer (if any)

The Data Controller is LA MAGNIFICA ROCA DEL CARIBE SOCIEDAD DE RESPONSABILIDAD LIMITADA, with registered office in Provincia 07 Limon, Canton 04 Talamanca, Cahuita, Puerto Viejo, Playa Negra, Del Hotel Banana Seiscientos Metros Al Sur, En Finca La Joya Volando.

To exercise your rights under the regulations, you can contact the Data Controller at its office or by calling +506 6185 9101 or writing to [info@villasrocaedelcaribe.com](mailto:info@villasrocaedelcaribe.com)

### Purpose and legal basis for processing

The Data Controller explains below for what purposes it processes site user data.

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|--|---|
| <b>Purpose of processing</b>             | <b>Fulfilling legal obligations</b>   |
| <b>Description</b>                       | Data processing is necessary for the fulfillment of obligations required by law, regulation, or EU legislation                                |
| <b>Legal Basis</b>                       | Fulfillment of a legal obligation to which the data controller is subject (Art. 6 para. 1 lit. c) GDPR 2016/679)                              |
| <b>Nature of conferment</b>              | The provision of data is necessary to fulfill a legal obligation  |
| <b>Consequences of failure to confer</b> | N.A.  |
| <b>Storage time</b>                      | That required by the relevant legislation   |
| <b>Effective retention time</b>          | From the provision of data  |
| <b>Purpose of processing</b>             | <b>Statistical analysis on aggregated or anonymized data</b>  |
| <b>Description</b>                       | The processing does not allow user identification, but serves to verify the adequacy of the web marketing campaigns adopted and/or the proper |

functioning of the site, measuring the user traffic it generates. The processing of aggregated or anonymous data, which do not allow the identification of the user, does not fall under the scope of the legislation on the protection of personal data and therefore no consent is required for their processing.

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| <b>Legal Basis</b>                       | N.A. |
| <b>Nature of conferment</b>              | N.A. |
| <b>Consequences of failure to confer</b> | N.A. |
| <b>Storage time</b>                      | N.A. |
| <b>Effective retention time</b>          | N.A. |

**Purpose of processing**      **Availability request**

|  |   |
|--|---|
| <b>Description</b>                       | Data processing is necessary to provide feedback to the availability request on the dates indicated   |
| <b>Legal Basis</b>                       | Execution of a contract to which the data subject is a party or execution of pre-contractual measures taken at the request of the data subject (Art. 6 para. 1 (b) GDPR 2016/679) |
| <b>Nature of conferment</b>              | The provision of data is necessary to fulfill a contractual obligation  |
| <b>Consequences of failure to confer</b> | Failure to provide data may result in total or partial inability to respond to the submitted request.   |
| <b>Storage time</b>                      | 2 years   |
| <b>Effective retention time</b>          | From the provision of data  |

**Methods of processing, automated decision making.**

Data processing is carried out in computer-based mode, although potential processing in paper-based mode is not excluded. No automated decision-making processes are used to process your personal data.

Any profiling by cookies is done against specific user consent: more information is available in the cookie policy and/or information banner at first access.

User profiling carried out by means other than cookies is described in the section "Purposes of processing," where carried out.

**Target audience**

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

- Computer service providers and hosting companies to ensure the operation of the site and other explicit purposes
- Communications companies, agencies, marketing consultants and platform providers for sending promotional communications
- Public authorities, administrations and agencies.

### **Transfer of data to third countries or international organizations**

Data disclosed will not be transferred by us to third countries or international organizations outside the EU. The hosting of the site is in Italy.

### **Rights of the data subject and complaint to the Privacy Guarantor**

You have the right to ask us at any time for access to the data concerning you, their amendment, supplementation or deletion, the restriction or opposition to their processing, where there are legitimate reasons, as well as the portability of these data to another Data Controller. We will provide you with a response in writing within 30 days. You may revoke, at any time, the consents you have given on this site, by contacting one of the contact details given within this Privacy Policy. You may also lodge a complaint with the Control Authority, where you believe that your data has been processed unlawfully.