

## Privacy terms

SpecialUmbria ("SU"), consisting of related companies (i) Macland Italia S.R.L., headquartered in Vocabolo Polino Alto 25/B, 06066 Piegaro (PG), Italy, and (ii) Macland B.V., with its registered address at Benoordenhoutseweg 63, 2596 BC The Hague, The Netherlands, respects its clients' privacy and is committed to ensuring that such privacy is protected in conformance with applicable laws. In these privacy terms ("Privacy terms") you can read which information SU stores, how and where and how this data is secured, as well as how SU uses this information. The Privacy terms apply to our Website ([www.specialumbria.com](http://www.specialumbria.com) and all related websites) as well as the services offered by SU to you under any contract. SU complies with the General Data Protection Regulation, and when implemented, relevant provision of Dutch and Italian law.

### Are you under the age of sixteen?

If you are younger than sixteen years old, you cannot use our Website and services without the permission of your parents or legal guardian.

### Personal data

To offer our Website and perform our services we process personal data. "Personal data" means any information relating to an identified or identifiable natural person. This definition used in our Privacy terms is not identical to the definition of Personal Data as stipulated in the relevant legislation for reasons of readability.

### Your permission

We can store your data at various moments, for example when you visit our Website, create an account via our Website, use our Services or when you contact us. We are allowed to process your personal data because we explicitly ask your permission with reference to these Privacy terms. In addition, we need your data to carry out the agreement between you and us. If you choose not to share your data, then we cannot deliver our services to you. We will not process your data without your consent, unless we are legally obliged to do so.

### Treatment personal data

If and when you book a short-term rental, you sell and/or buy a real estate property, or have your real estate property (project) managed through SU, you are automatically added to its customer address database. SU will use your information to inform you of the status of your reservation and payment and send you the necessary details about your stay. In case of a real estate purchase and/or sale, or (project) management of real estate property, SU will use the information to communicate directly with you. SU will in no case provide your personal information to any third party unless explicitly authorized by you, except those third parties who process data under a contract with us and under the applicable privacy rules.

### Collected personal data

SU informs you that for the achievement of the contractual purpose, the data relating to you may be communicated to third parties such as, but not limited to: natural or legal persons involved in the conclusion of the agreement, authorities, administrative persons or entities and any others related to the sale/purchase, rental and/or (project)management of properties and performance of functional activities to the completion of all obligations under the contract entered into. Your data may be shared with employees or business partners of SU in order to achieve the obligations under the contract.

### **Automatically collected information**

The following information is automatically recorded on the SU server when you visit the Website:

- the pages which are visited, for SU statistics;
- your IP address (a unique number which is automatically assigned to your computer by your internet provider when you enter the internet), in order to be able to identify you as a unique visitor for SU statistics;
- the name of your computer system and type of internet browser, so that SU may continue to improve the systems which its visitors use, and so that SU will be able to solve any potential future problems. No personal information whatsoever will be read from your computer through this process. In addition, under no circumstances will this information be used to personally identify you.

### **Cookies**

Our Website uses cookies. Cookies are temporary (text) files which are stored on your computer in which information is saved for use on our Website. SU uses the cookies for Google Analytics. The information generated by the cookie about your use of our Website (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. Google will use this information for the purpose of evaluating your use of our Website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of our Website. By using our Website, you consent to the processing of data by Google in the manner and for the purposes set out above. The Website also uses AddThis for which cookies are collected.

### **Social media**

It is possible that the provider of social media sends us information (according to its policy), if you use social media functions on our Website. That can be your name, profile picture, gender, friends list and other information that you provided previously to them. If you don't want the social media provider to send us such information, you should change the privacy settings on your social media account. If you are on a webpage that uses social media add ins, your browser sends certain information to the provider of your social media account. SU does not control this data sharing.

### **Newsletter**

SU offers digital newsletters. In such way, you are fully informed of all SU's offers and other news. We use an opt-in system for registration of the newsletter. Every time we send you a newsletter you have the possibility to unsubscribe by pressing on the "unsubscribe" link in the footer of the newsletter.

### **Security**

SU works hard to protect your personal data from unauthorized or unlawful access, alteration, disclosure, use or destruction. That way, unauthorized persons do not have access to your personal data. SU takes the following measures to protect your personal data:

- Secure network connections with Secure Socket Layer (SSL) technology or a technology that is similar to SSL;
- Secure environment of data that comply to the standards of ISO 27001;
- Secure environment of data that comply to the standards of ISO 27002;
- The access to the data is limited to the persons that need the data;
- The access of the data is secured with two-step verification.

**How long does SU store your data?**

SU shall store your personal data for as long as necessary to fulfill the purposes listed above.

**With whom does SU share your personal data?*****Processors***

SU may share your personal data with others. In a data processing agreement, SU shall agree with those parties that they shall use your data carefully and they shall only receive the data that is relevant for their services. These parties use your data in accordance with SU instructions and not for their own purposes. SU can share your data for example with online storage services, public authorities [e.g. personal (ID) data for rental stays] and payment service providers. They will take care of the storage of the data and the correct processing of vouchers, invoices, payment details and other related communication with the client. These parties are 'processors' within the meaning of the relevant legislation.

***Third parties***

Sometimes SU shares your data with third parties who are not processors. SU will agree with those parties that they will use your data carefully. They will only use your data in accordance for the purposes that SU received your data for.

**Transfer**

SU will only process your data within the European Union (EU). SU will only process your data outside of the EU if the country has an effective protection level for your data. SU will never transfer your data to other countries or other parties than described above. Provision of certain information is mandatory by Italian law and will only be shared with the Italian authorities. All provided personal identification information will be destroyed within two (2) weeks after a rental period has ended.

**Breach**

For information on how SU handles any information breach, please consult our data breach policy, published on the Website.

**Links**

You may find advertising or other content on our Website that link to other websites. SU does not control the content on these websites and is not responsible for the content (with any eventual errors and/or omissions) on these websites or the privacy protection of these websites. SU advises you to read the privacy policies of those websites.

**Payments**

For its rental activities SU uses the payment services of Mollie ([www.mollie.com](http://www.mollie.com)). Mollie is an exclusive business partner of SU, certified to handle third party payments for its clients. Payments to SU will be listed as 'Stg Mollie Payments' in your bank statement.

**Copyright**

SU maintains copyright on its own information provided through its website, including its own names, trademarks, logotypes, logos and photo material. None of the texts, pictures or graphics on the website may be published, distributed and/or copied without written permission by SU. Use of the information for private purposes is permitted.

**Public Information**

Information you provide as feedback will be read by other visitors. Please take care you do not put any personal information into your feedback. SU reserves the right to reject or modify responses at its sole discretion and without giving its reasons for doing so.

## **Disclaimer**

All information provided on our Website is SU responsibility and is provided AS IS. SU pays the greatest attention to keeping the information on its Website as current, accessible, correct and complete as possible. Nevertheless, the information on the Website may sometimes become outdated, incomplete or indeed incorrect. No rights shall thus be derived from the information provided on this Website. SU cannot be held liable for the consequences of any use of the information which is supplied on its website.

## **Modifications to these Privacy terms**

SU may update our Privacy terms from time to time. When SU changes these Privacy terms in a significant way, SU will post a notification on its Website along with the updated Privacy terms. SU also informs users that are registered with an email address in case of any significant moderation. If you are not registered as a user, SU advises you to visit the Website and read these Privacy terms regularly.

## **Your rights**

The data SU collects is personal. Therefore, you have the following rights:

- You may request access to the personal data SU processes about you;
- You may request us to correct, update, shield or delete your personal information in our records;
- You may request a copy of the personal data SU has processed about you. SU can, upon your request, send this copy to another party, so you don't have to send the data yourself;
- You may file a complaint against processing your data, eventually with the competent authority if you are under the impression that we process your data unlawfully;
- You may always withdraw your consent to process your data. SU cannot process your data from the moment you withdraw your consent.

Please contact SU by email ([info@specialumbria.com](mailto:info@specialumbria.com)) if you would like to receive a written copy of your information registered by SU or if you would like to have your data changed. You will receive a reply as soon as possible and in any event within four (4) weeks from such request.

## **Contacting Us**

If you have any questions about these SU Privacy terms or any other matter with regard to SU services or its Website, then feel free to contact SU without any obligation. Your question or comment will be handled professionally and confidentially as quickly as possible.

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