APARTMENTSFLORENCE SRL

PRIVACY POLICY

PRIVACY POLICY – UPDATED 20/05/2026

Data processing policy pursuant to Art. 13 of Regulation (EU) 2016/679 (GDPR) on the protection of personal data

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Original document dated 30-05-2018; Article 10 updated. Other provisions unchanged.

Presentation of APARTMENTSFLORENCE SRL

APARTMENTSFLORENCE SRL is a company providing property maintenance, assistance and management services.

ART. 1 - General information and definitions

1) The present policy explains how APARTMENTSFLORENCE SRL processes the personal data collected as follows:

a) when the data subject visits the website www.apartmentsflorence.it or uses other computer-based and social media platforms managed by APARTMENTSFLORENCE SRL;

b) when the data subject requests to use a service provided by APARTMENTSFLORENCE SRL or by third parties authorised by APARTMENTSFLORENCE SRL;

c) any interaction of any sort by any means, including verbal interaction between the data subject and APARTMENTSFLORENCE SRL.

Requests and interaction may occur in various ways, including but not limited to filling out paper forms, visiting and browsing the APARTMENTSFLORENCE SRL website (www.apartmentsflorence.it), registering on and using computer-based platforms to book apartments, browsing APARTMENTSFLORENCE SRL social media channels (Facebook, Twitter, Google+, YouTube, Instagram, Pinterest, Foursquare, LinkedIn, Snapchat, Flickr) and verbal interaction with those authorised to carry out data processing by APARTMENTSFLORENCE SRL.

2) The following definitions are referred to:

a) “Personal Data”: any information relating to an identified or identifiable natural person.

b) “Data Subject”: the natural person to whom the personal data refers.

c) “Controller”: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

d) “Processor”: a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

e) “Processing”: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

f) “Consent of the data subject” (or “consent to processing”): any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

g) “User”: the individual who for various reasons interacts with APARTMENTSFLORENCE SRL and who, unless when specified otherwise, is the data subject.

ART. 2 – Types of Personal Data processed.

1) APARTMENTSFLORENCE SRL requires its users to supply the minimum data necessary for it to be able to provide the service, in addition to any optional data used for the personalisation of the services or for marketing purposes, and which, if not provided, does not affect the user’s ability to access the desired service. The necessary and optional data requested may vary depending on the type of service or activity that the data subject wishes to access.

2) Necessary data is marked with an asterisk (*) across all contact and service provision channels, and all paper and online forms.

3) If in the performance of its activities, APARTMENTSFLORENCE SRL is required to collect and process data that falls under “sensitive data categories” (i.e. data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation) or data relating to criminal convictions or offences, APARTMENTSFLORENCE SRL shall request that the data subject provide their explicit consent to the processing of such data.

4) By providing their consent (whether verbal or written), using the service or communication channel, or carrying out any type of unambiguously positive action confirming their agreement to the processing of their personal data, the user provides their specific consent to the processing of their personal data.

5) The user assumes responsibility for third party personal data acquired, published or shared by using the APARTMENTSFLORENCE SRL tools (website, social media networks, other communication, etc.) and, in the event that they process it, guarantees that they have the right to do so, including the right to communicate or diffuse it, releasing APARTMENTSFLORENCE SRL of any liability towards third parties.

ART. 3 - Categories of Personal Data processed

1) Personal data processed to access activities and/or use services.

a) Necessary data.

In general, the data subject’s first name and surname, email address, full address (street and house number, town, city, postcode, etc.) are considered necessary data.

The necessary data requested may vary depending on the type of service or activity that the data subject wants to access, however it will always be in line with the minimisation principle, i.e. to ask the user for the minimum data required for the specific purpose.

Necessary data are not usually qualifiable as belonging to a specific category. In the event that the necessary data requested for the activation of a specific service and/or activity is presented as data belonging to a specific category, specific consent from the user will be requested for the processing of this data.

b) Optional data.

Types of optional data include but are not limited to: tax code (only for Italian citizens), telephone number, mobile number, qualification, profession, and country of origin/residence.

Data subjects who provide telephone numbers may be contacted for the provision of timely communication in relation to the type of service or activity to which they have access. In any case, such data will be processed in order to respond to the legitimate interests of APARTMENTSFLORENCE SRL.

2) Personal data processed when booking an apartment.

Bookings can be made on the internet or via verbal interaction or other interaction channels.

a) Necessary data. When making a booking, the data subject may be required to provide the following necessary information: first name, surname, email address, full address (street and house number, town, city, postcode, etc.). The data subject may also be required to indicate the apartment that they intend to book, as well as how long they intend to stay there and the number of guests that will be present.

b) Optional data: some optional data may be also be requested, such as date of birth, tax code (only for Italian citizens), telephone number, mobile number, qualification, profession, and country of origin/residence. The user

may also provide information via a free text field entitled “Comments”: the user assumes full responsibility for his or her own personal data or that of third parties that may be provided in this section.

The data requested is not qualifiable as belonging to a specific data category, or as relating to criminal convictions and offences.

3) Personal data acquired to manage payments and guarantee deposits.

Necessary data: name and surname of the credit card holder, type of credit card (American Express, Visa or Mastercard), credit card number and expiry date.

4) Personal data acquired for transmission of newsletter.

Data subjects may subscribe to the newsletter by enabling the relevant option on the website www.apartmentsflorence.it. Subscription is therefore optional and upon explicit request of the user.

Necessary data: email address.

Optional data: name and surname, date of birth, full address (street and house number, town, city, postcode, etc.), telephone number.

5) Personal data acquired via verbal interaction: when performing its normal working activities and providing its services, APARTMENTSFLORENCE SRL may process personal data acquired even solely through verbal interaction with the user. Such data is used exclusively to provide the user with access to the services or to perform its working activities, or to fulfil its contractual obligations. One example is the front-office activity and assistance provided by internal staff or specifically authorised individuals, who for the performance of their normal working activity, require the user’s minimum identification data (name, surname, telephone number, email address, mobile number, etc.).

APARTMENTSFLORENCE SRL internal staff and authorised individuals shall supply the user with the information relating to the way in which their personal data will be processed, and will obtain their verbal consent to the processing of such data, after which such data will be entered into the APARTMENTSFLORENCE SRL Information System for processing in line with what is indicated in the present Privacy Policy. A record of such consent shall be kept in the appropriate sections of the APARTMENTSFLORENCE SRL Information System and/or in the appropriate internal forms.

6) Contact data: when performing its normal working activities and providing its services, APARTMENTSFLORENCE SRL may process personal data inherent to the contact method, acquired even solely through verbal interaction with the user. Such data shall be used primarily or exclusively to contact the user if necessary.

This category includes name and surname, email address, telephone or mobile number, and any other contact methods indicated by the data subject.

Contact data may also include those relating to the property or places to which the service contract refers.

7) Data processed for statistical and marketing purposes.

APARTMENTSFLORENCE SRL monitors the quality of its processes and services via the analysis of personal data, and carries out statistical analyses for marketing purposes.

APARTMENTSFLORENCE SRL shall not perform profiling activities, and analysis processes are always managed by authorised staff.

In addition to processes conducted directly by authorised staff, APARTMENTSFLORENCE SRL uses Google Analytics for such analyses, a web analysis service supplied by Google Inc. (“Google”), which uses personal data

collected as the user browses the APARTMENTSFLORENCE SRL website and social networks, for the purpose of understanding and analysing such use and browsing behaviour.

With Google Analytics, it is also possible to compile reports and share them with other services developed by Google.

Google may use the personal data to contextualise and personalise advertisements across its own advertising network.

Furthermore, APARTMENTSFLORENCE SRL may process the personal data, provided that specific consent has been obtained from the data subject, for direct marketing activities through the use of tools and platforms like Whatsapp, Facebook Messenger, Skype, etc.

8) System logs and maintenance: for reasons relating to the functioning and maintenance of various APARTMENTSFLORENCE SRL information tools or of those belonging to third parties used by APARTMENTSFLORENCE SRL, system logs may be collected, i.e. files that record interactions, which may contain personal data, such as the User's IP address.

ART. 4 - Purpose and legal grounds

1) The provision of personal data is necessary in order to be able to use the services offered, and, therefore, refusal to provide them in full or in part may mean that it is not possible for APARTMENTSFLORENCE SRL to supply such services.

2) The legal grounds for processing personal data are based on:

a) the legitimate interest of the Controller in ensuring the security of the data provided by the user when using the services offered, above all for those accessible via the internet;

b) the legitimate interest of the Controller in providing the service requested by the user;

c) explicit consent to receive newsletters, information on initiatives, events, offers and other aspects concerning the activity performed by the Controller;

d) explicit consent to provide the personal data to third parties;

e) the necessity of the data to fulfil a contract to which the data subject is a party or to fulfil pre-contractual measures adopted upon request of said data subject;

f) the need for the Controller to fulfil legal obligations.

3) APARTMENTSFLORENCE SRL shall process the user's email address for various purposes:

a) For contact reasons inherent to the execution of specific contracts;

b) In order to supply information on initiatives, events and advertising campaigns if the data subject has provided his or her explicit consent to the processing of their data for such purposes;

c) To send the data subject the newsletter if explicit consent has been provided by the data subject when registering for the specific service to the processing of their data for such purpose.

4) APARTMENTSFLORENCE SRL shall process the user's telephone number for various purposes:

a) For contact reasons inherent to the execution of specific contracts;

b) In order to supply information on initiatives, events and advertising campaigns if the data subject has provided his or her explicit consent to the processing of their data for such purposes;

5) The data subject may withdraw their consent at any time by sending an email to info@apartmentsflorence.it containing the information necessary to correctly identify the data subject and the type of data for which the data subject wishes to withdraw their consent. In the event that the data subject sends a generic request to withdraw their consent to the processing of their data, APARTMENTSFLORENCE SRL shall apply such withdrawal to all data types.

6) Processing shall be based on principles of correctness, lawfulness and transparency, minimisation, accuracy, integrity, confidentiality and security of the data processed, as well as retention limitation and protection and safeguarding of the rights of the data subject.

ART. 5 - Categories of Personal Data Recipients

1) Data shall not be "diffused", i.e shall not be made known in any way to unknown parties and will not be made available for them to consult.

2) Furthermore, when such data is voluntarily provided for the provision of a specific service, the data shall not be disclosed or transferred for any reason to third parties without explicit authorisation.

3) The data may however by "communicated", i.e. made known to one or several determined parties as outlined below:

a) to internal parties directly or formally authorised by APARTMENTSFLORENCE SRL;

b) to external parties directly or formally authorised by APARTMENTSFLORENCE SRL for the performance of a specific service activity directly related to the existing contract, as long as an appropriate private agreement has been signed that requires compliance with the current data protection regulation (GDPR 2016/679), including a duty of confidentiality and security when processing data. This includes, but is not limited to: consultants, professionals, companies, entities or other third parties, within the limits necessary to perform the task assigned. In the event that said external parties declare to be no longer compliant with the provisions laid out in the GDPR 2016/679, APARTMENTSFLORENCE SRL shall be responsible for finding immediate replacements. In the intermediary period whilst such parties are being replaced, APARTMENTSFLORENCE SRL shall implement all actions necessary to maximise the protection of the rights of the data subjects.

c) to third parties in compliance with a summons, legal system, court order, legal proceeding, or any other legal obligation, or to pursue available remedies or defend its own legal rights.

4) APARTMENTSFLORENCE SRL may also provide the user's personal information to third parties if the user provides their explicit consent. If APARTMENTSFLORENCE SRL has acquired the user's consent, it may also communicate data to third parties for commercial or marketing purposes, or for any other type of permitted activities.

ART. 6 – Place of processing and transferring of Personal Data

1) The registered office of APARTMENTSFLORENCE SRL is located at Borgo degli Albizi 15, Cap 50122, Florence (FI).

2) It shall not transfer users' personal data to any other Country, either European or otherwise.

3) This activity shall be performed within national territory.

4) In the event that APARTMENTSFLORENCE SRL is required to transfer personal data, for example, to take part in a European or non-European project, an additional policy will be provided and specific consent will be requested.

5) In case of use of software, applications or other IT solutions, however they are named, owned by third parties, please read the specific "Privacy Notice" of these parties, also for the identification of the place of data processing.

ART. 7 - Processing modalities

1) The processing shall be carried out:

a) using manual and automatic systems;

b) by individuals authorised to perform such tasks, pursuant to the law;

c) employing suitable measures that guarantee the confidentiality of the data and prevent access to such data by non-authorised third parties, and in full compliance with the current data protection regulation (GDPR 2016/679).

ART. 8 - Cookies and analogue technologies

1) In order to analyse the way in which the user and other visitors browse the APARTMENTSFLORENCE SRL website, and to compile aggregated statistics on use of the website and on response times, APARTMENTSFLORENCE SRL, with the assistance of third party analysis service providers, shall collect certain information when the user visits the website.

Such information includes the IP address and geographical position of the device, browser type and language, the date and time of the request, how long the user is on the site, views, and page features (e.g. links) selected.

2) APARTMENTSFLORENCE SRL may use cookies, pixel tags, Web beacons, clear GIFs or other similar tools on its website or in its emails to collect and analyse such information.

APARTMENTSFLORENCE SRL uses this information to provide optimised content, to evaluate the effectiveness of the information provided, to identify and resolve any problems, and to improve the overall website experience.

3) APARTMENTSFLORENCE SRL also uses cookies installed from other websites on its website in order to allow users to connect to their social media accounts and to share website content via social media networks (Facebook, Twitter, Google+, YouTube, Instagram, Pinterest, Foursquare, LinkedIn, Snapchat, Flickr).

4) If the user does not want their information to be collected using this technology, on most browsers there is a simple process that allows the user to automatically disable the majority of these technologies, or to choose to either disable or enable them.

5) APARTMENTSFLORENCE SR requests consent to use these cookies on its website and manages such preferences within the site itself. Some cookies are however necessary to ensure the basic running of the site, and it is not possible to deactivate them.

ART. 9 - Updates to the Privacy Policy

1) APARTMENTSFLORENCE SRL reserves the right to update the present Privacy Policy to reflect changes made following technological and regulatory developments.

To find out when the Privacy Policy was last modified, refer to the date in the top right-hand corner of each page.

2) Modifications are deemed valid when the new version of the Privacy Policy is published.

3) If substantial modifications are made, a notification will be sent to the user, and if required by current legislation, their consent will be requested. This notification shall be communicated via email or published on the APARTMENTSFLORENCE SRL website.

ART. 10 - Retention of Personal Data

1) APARTMENTSFLORENCE SRL shall retain and process personal data, including contact data, for no longer than is strictly necessary to fulfil the purposes for which such data were collected or subsequently processed, in accordance with the principles of lawfulness, fairness, transparency and storage limitation set out in Regulation (EU) 2016/679 (GDPR).

2) Data and documentation subject to retention obligations under tax and accounting legislation shall be retained for 10 (ten) years, calculated from the starting date prescribed by the applicable legislation, without prejudice to any longer statutory retention periods or the need to protect legal rights in judicial proceedings.

ART. 11 - Controller and Processor

1) The Controller is APARTMENTSFLORENCE SRL Borgo degli Albizi 15, Cap 50122, Firenze (FI) - REA No.: FI-602633 - Partita Iva (VAT ID) 06126730487 - telephone number +390552679309 email address info@apartmentsflorence.it.

2) The Processor is APARTMENTSFLORENCE SRL and can be contacted via the details in the previous point.

ART. 12 - User rights

1) Pursuant to the General Data Protection Regulation (GDPR 2016/679), the user has the right to:

a) request from APARTMENTSFLORENCE SR access to their personal data (receiving the information relating to the personal data of which the Controller is in possession free of charge, as well as a copy thereof in an accessible format);

b) request from APARTMENTSFLORENCE SR the rectification of their data (the user may request for incorrect or inaccurate data, including data that is no longer up to date, to be corrected);

c) request from APARTMENTSFLORENCE SR the restriction of processing (the data will only be retained so that it can be later restored, but, in the meantime, the Controller will not be able to consult it if not in line with the validity of the restriction request);

d) object to the processing of their data for legitimate reasons;

e) withdraw their consent, which can be executed at any time, resulting in the processing of their data being terminated;

f) request from APARTMENTSFLORENCE SR the erasure of the data (right to be forgotten);

g) exercise their right to data portability: upon the explicit request of the data subject and in line with the technological and IT standards required and those adopted by APARTMENTSFLORENCE SRL, the data shall be transmitted to the party indicated by said data subject in a format that ensures that such data is easy to consult and use.

2) All the above cases are without prejudice to the right to lodge a complaint with a supervisory authority.

3) The data subject may withdraw his or her consent at any time by sending an email to info@apartmentsflorence.it containing the information necessary to correctly identify the data subject and the type of data for which the data subject wishes to withdraw their consent.

Should the data subject withdraw their consent to the processing of all or part of their personal data, it may mean that it is not possible for APARTMENTSFLORENCE SRL to provide the service.

In the event that the data subject sends a generic request to withdraw their consent to the processing of their data, APARTMENTSFLORENCE SRL shall apply such withdrawal to all data types.

4) To exercise their right to rectification, erasure, restriction of processing, data portability, or their right to object, the data subject must send an email to info@apartmentsflorence.it.

ART. 13 - Application of Privacy Policies of third parties

Information regarding the methods of data processing by software providers, applications or other IT or technical or technological solutions, however named, or accessory services, necessary or connected to the activity of APARTMENTSFLORENCE SRL, can be found in the "Privacy Policy" of these suppliers.