

## NEWSLETTER SUBSCRIPTION INFORMATION

Pursuant to EU Regulation 679/2016, we would like to inform you that, following your subscription to the newsletter, your personal data will be processed by Golf Bogliaco S.r.l. subject to the direction and coordination of Terme and Grandi Alberghi Sirmione S.p.A, in its capacity as Data Controller.

### a. Purpose

The data will be processed, only if you give your consent in relation to the individual purposes, to:

**1. I would like to be updated on the latest news and promotions**, you authorize Golf Bogliaco srl to send newsletter and further promotional material on the services provided by Golf Bogliaco srl including discounts, vouchers, product samples both through traditional channels (e.g. telephone calls with operator and paper mail), and through automated channels such as e-mail, SMS, communications through social media (Facebook, Instagram, etc...), as well as to inform you of purchasing opportunities and promotions of products and services provided by partner companies.

**2. I would like to receive personalized discounts and news updates**, you authorize Golf Bogliaco srl to send promotional and informative material in line with your preferences, habits and consumption choices.

We would like to inform you that when you receive communications by e-mail, certain information relating to receiving these communications or opening the links contained there will be collected by means of anonymous statistical tracking and for the sole purpose of optimising the submission system.

### b. Legal basis for processing

Processing personal data for these purposes is free. Refusal to provide personal data or refusal to give consent shall only result in you not being able to receive promotional communications from the Data Controller.

### c. Processing method and the possible communication of data

Processing will be carried out on the personal data provided directly by you by means of: filling in forms; front desk forms at the Data Controller's individual facilities; or, if you give your consent for purpose 2, on additional personal data inferred from your habits, consumer choices, purchases, etc.

The processing will be done manually and by means of computerised devices, with organisational methods and logic strictly related to the indicated purposes. The personal data will therefore be stored for a period of time consistent with the objectives pursued in carrying out the company's promotional activities, taking into account any expressed opposition. The aforementioned purposes may also be achieved by passing on and communicating data to third parties, understanding third parties as those authorised to process the data themselves, insofar as they are entrusted with carrying out or providing specific services which are strictly functional to the performance of the contractual relationship, such as suppliers of products and services related to the pursued purposes. Your personal data will not be disseminated.

In order to achieve the purposes set out in point 2(a) of this Article, the personal data may be sent to third countries, in particular to your CRM application provider and External Data Processor. The Data Controller will check that these data recipients comply with the provisions of Articles 44 and 49 of the GDPR. In the absence of an adequacy decision pursuant to Article 45(3) or adequate safeguards pursuant to Article 46, including Binding Corporate Rules and pursuant to Article 49 of the GDPR, the Data Controller requests you provide for the possibility of sending personal data to a third country or an Organisation after obtaining your specific consent.