

PRIVACY POLICY – WEBSITE

Information document pursuant to and for the purposes of Article 13 of Regulation (EU) 2016/679 (GDPR)



WHY THIS INFORMATION?

Pursuant to Regulation (EU) 2016/679 (hereinafter “GDPR”), this page describes the methods of processing personal data. This notice is provided in accordance with Article 13 of the GDPR. The information is not to be considered valid for other third-party websites that may be accessed through links on this website, for which no responsibility is assumed.

Personal Data Subject to Processing

* **Personal Data:** any information relating to an identified or identifiable natural person (“data subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person (Recitals 26, 27, 30 GDPR).

* **Data of contractors/users.**

* **Browsing Data:** the computer systems and software procedures used to operate this website acquire, during their normal operation, certain personal data, the transmission of which is implicit in the use of Internet communication protocols. This category of data includes IP addresses or domain names of the computers and terminals used by users, URI/URL (Uniform Resource Identifier/Locator) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the server’s response (successful outcome, error, etc.), and other parameters related to the user’s operating system and IT environment.

* **Data Voluntarily Provided by the User:** the optional, explicit, and voluntary sending of messages to the contact addresses indicated on this website and/or the completion of data collection forms entails the subsequent acquisition of the sender’s address, necessary to respond to the requests, as well as any other personal data entered.

Information Regarding the Processing of Personal Data Carried Out Through Social Media Platforms

With regard to the processing of personal data carried out by the operators of the Social Media platforms used by the Controller, reference should be made to the information provided by them through their respective privacy policies. The Controller processes personal data provided by users through the dedicated pages of Social Media platforms, for the purpose of managing interactions with users (comments, public posts, etc.), in compliance with the applicable legislation.

Specific Notices

Specific privacy notices may be present on certain pages of the website in relation to particular services or data processing activities provided.



COOKIES AND OTHER TRACKING SYSTEMS. WHAT ARE THEY? WHAT ARE THEY USED FOR?

For information regarding cookies and other tracking systems, please refer to the cookie policy available in the footer of the website and at the following link <https://www.bogognogolfresort.com/site/filestore/media/10-PDF/BGR-cookiepolicy-2025-EN.pdf>



1. WHO IS THE DATA CONTROLLER? HOW CAN YOU CONTACT THEM?

The Data Controller is BOGOGNO GOLF CLUB S.R.L., with its registered office at Via Pontaccio no. 10, 20121 Milan (MI), and its operational headquarters at Via Sant’Isidoro no. 1, 28010 Bogogno (NO), represented by its pro tempore Legal Representative, who can be contacted for any information at: **Telephone: +39.0322.864137 E-mail: privacy@bogognogolfresort.com**

2. PURPOSES OF THE PROCESSING, LEGAL BASIS, DATA RETENTION PERIOD, NATURE OF PROVISION

 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF THE PROVISION
Browsing on this website The data necessary for the use of web services are also processed for the following purposes: * to obtain statistical information on the use of the services (e.g. most visited pages, number of visitors by time slot or per day, geographical areas of origin, etc.); * to verify the proper functioning of the services provided.	The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by third parties, provided that such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require the protection of personal data, taking into account the reasonable expectations of the data subject and the activities strictly necessary for the functioning of the website and for browsing itself. (Art. 6(1)(f) and Recital 47 GDPR) Data subjects are guaranteed the right to obtain, upon request, information on the balancing test carried out.	Browsing data will be retained for the duration of the browsing session only.	The provision of data is necessary in order to browse the website.
Use of cookies and similar technologies. Please refer to the Cookie Policy available in the website footer.	For non-technical cookies and similar technologies that are not strictly necessary, processing is based on the consent of the data subject (Art. 6(1)(a) and Recitals 42, 43 GDPR). Consent is given through the cookie banner and the Cookie Policy of the website.	Please refer to the Cookie Policy available in the website footer.	Please refer to the Cookie Policy available in the website footer.

In addition to browsing, personal data will be processed for:

 PURPOSE OF THE PROCESSING	 LEGAL BASIS	 DATA RETENTION	 NATURE OF THE PROVISION
A) Contacts The processing of personal data is carried out for the purpose of enabling the submission and management of contact requests, as well as the provision of general information.	The processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Recital 44). Article 6(1)(b) GDPR.	Maximum 12 months.	The provision of personal data is necessary. Failure to provide the required data will result in the impossibility of being contacted and receiving information.
B) Management of Requests Personal data are also processed in order to handle your requests, as well as those that may be submitted by other data subjects, pursuant to Articles 15 et seq. of Regulation (EU) 2016/679 ("GDPR"), concerning the exercise of the rights of the data subject.	The processing is necessary for compliance with a legal obligation to which the controller is subject (Recital 45). Article 6(1)(c) GDPR.	5 years from the closure of the request, unless litigation arises.	The provision of personal data is mandatory, as it is essential for the fulfillment of legal obligations.



3. TO WHOM WILL PERSONAL DATA BE DISCLOSED? DATA RECIPIENTS

Personal data will be disclosed to entities that will process the data as independent data controllers or as data processors (Article 28 GDPR), and will be processed by natural persons (Article 29 GDPR) acting under the authority of the Controller and the Processors, on the basis of specific instructions provided regarding the purposes and methods of processing.

Data will be disclosed to recipients belonging to the following categories:

- * Entities providing services related to the website and communication networks, including email, hosting, and website management;
- * Competent authorities, in order to comply with legal obligations and/or provisions issued by public bodies, upon request.

The list of processors pursuant to Article 28 GDPR is available upon request by writing to privacy@bogognogolfresort.com or by contacting the other addresses indicated above.



4. WILL DATA BE TRANSFERRED TO NON-EEA COUNTRIES?

Personal data will be transferred to non-EEA countries. In particular, such transfers will take place on the basis of Article 45 GDPR (adequacy decision). Specifically, the Controller makes use of providers that adhere to the EU-U.S. Data Privacy Framework, namely Google LLC.

Furthermore, the transfer of data outside the EEA through social media platforms will be managed in accordance with the general terms and privacy policies of the respective social networks.

For further information regarding the transfer of data outside the EEA, you may contact the Data Controller at the contact details indicated above.



5. IS THERE AN AUTOMATED PROCESSING?

Personal data will be processed through traditional manual, electronic, and automated means. It should be noted that no fully automated decision-making processes are carried out.



6. WHAT ARE YOUR RIGHTS? HOW CAN YOU EXERCISE THEM?

Data subjects may exercise their rights as set forth in Articles 15 et seq. GDPR by contacting the Data Controller at the email address privacy@bogognogolfresort.com, or by writing to the contact details indicated above.

The Controller guarantees data subjects the right to request, at any time, access to their personal data (Article 15), rectification (Article 16), erasure (Article 17), and restriction of processing (Article 18). The Controller shall notify (Article 19) each recipient to whom personal data have been disclosed of any rectification, erasure, or restriction of processing carried out, and shall inform the data subjects, upon request, of such recipients.

The Controller guarantees the right to data portability (Article 20) and, in the event of requests pursuant to Article 20, will provide the data subjects with their data in a structured, commonly used, and machine-readable format.

Data subjects also have the right to object (Article 21), at any time, to the processing of personal data based on legitimate interest, by writing to the contacts indicated above with the subject line “objection.” In the event of an objection to processing based on legitimate interest, the Controller shall ensure that data subjects may obtain, upon request, information regarding the balancing test carried out.

Should data subjects believe that the processing of their personal data by the Controller is in breach of Regulation (EU) 2016/679, they are entitled to lodge a complaint with the competent supervisory authority (https://www.edpb.europa.eu/about-edpb/about-edpb/members_en), in particular in the Member State of their habitual residence, place of work, or the place of the alleged infringement (Italian Data Protection Authority – Garante Privacy: https://www.garanteprivacy.it/web/garante-privacy-en/home_en, or to pursue the appropriate judicial remedies.



7. CHANGES TO THIS PRIVACY NOTICE

The Controller may amend, modify, add to, or remove any part of this Privacy Notice. In order to facilitate the verification of any changes, this Privacy Notice will include the indication of the date of its latest update.

Updated on: May 30, 2025