

Last Modified Date: August, 2019

Legal Notice and Privacy Policy

Monteverdi Residence Club LLC and the Maria Mazzone Center For The Arts & Humanities, s.r.l. (together, sometimes referred to as “Monteverdi,” “us,” or “we”) respect and value your privacy. As part of our commitment to use the information you share with us responsibly, we want you to be familiar with how we collect, use, and disclose information relating to you, your computer, or your device that enables your identification (“Personal Information”). This Privacy Policy describes our practices with Personal Information that we (or our service providers) collect:

- from you (sometimes referred to as “user”) through any of our websites that link to this Legal Notice and Privacy Policy (collectively, the “Site”);
- through our social media pages that we control from which you are accessing this Privacy Statement (the “Social Media Pages”);
- through HTML-formatted email messages that we send to you that link to this Privacy Statement and through your communications with us; and
- when you visit or stay as a guest at our property or through other offline interactions with us if you are inquiring about a visit or stay at our property.

Together, we refer to the Site and Social Media Pages as “Online Services” and, together with offline channels, the “Services.”

This Privacy Policy is incorporated into Monteverdi Website’s Terms and Conditions of Use by reference, as if set forth fully therein. By using the Site, you agree and consent to the Terms and Conditions and this Privacy Statement.

Monteverdi can be contacted at privacy@monteverdituscany.com

1. What information do we collect from you?

When you interact with us through the Services, we may collect Personal Information from you as described below.

a. Information You Provide

We collect Personal Information that you knowingly choose to submit in order to benefit from specified features of the Online Services or to participate in certain activities, such as information that you knowingly provide when you contact us through the “Contact Us” portion of the Site. For example, if you inquire about a booking on the Site, you may provide us with information such as your name, address, telephone number, and email address. We will collect the information you knowingly provide if you respond to a survey, contest, or promotional offer. If you make a reservation over the phone, communicate with us by email, fax, or via online chat services, we will collect the personal information that you knowingly provide.

When making a reservation through the Site, we collect information relevant to the reservation, including travel itinerary, billing address, name, email address, and phone number. We also collect guest preferences, such as language preference, interests, hobbies, food and beverage choices, dates of special occasions like a birthday or anniversary, and services and amenities in which you are interested with respect to your stay at our property. We will collect credit or debit card information or other payment date through our payment processor as necessary to process payment for your stay.

If you submit personal information about other people to us, such as if you make a reservation for another individual, you represent to us that you have the authority to do so and you permit us to use the data in accordance with this Privacy Policy.

b. If You Stay at Our Property

If you are a guest at our property, we collect information when you purchase goods and services on the property, such as if you eat at a restaurant or if you take advantage of child care or spa services. We may collect images and video and audio data through security cameras located in public areas, such as in the lobby. If you attend an event, we may collect information related to your attendance at the event.

c. Passively Collected Information and Choices

Also, as you navigate the Site or use the Social Media Pages, certain Personal Information may be passively collected, meaning it is gathered without your actively providing it. The types of information passively collected, as well as the techniques used to collect and how we may use these types of information, are provided below.

- *IP Addresses:* An IP address is a unique identifier that certain electronic devices use to identify and communicate with each other on the Internet. When you visit our Site, we may view the IP address of the device you use to connect to the Internet. We use this information to determine the general physical location of the device and understand from what geographic regions our website visitors come. We also may use this information to enhance our Site.
- *Through Your Browser:* Certain information is collected by most browsers, such as your Media Access Control (MAC) address, computer type and operating system type and version screen resolution, and Internet browser type and version. Just as IP addresses, we may use this information to enhance our Site and user experience.
- *Using Monitoring Tools:* The Site may utilize pixel tags, web beacons, clear GIFs, Flash Shared Objects, HTML5 Local Storage, HTML5 Mini Databases, and other similar technologies, both on certain aspects of the Site and in HTML-formatted e-mail messages to you. These monitoring tools are used for the purpose of, among other things compiling statistics about Site usage and tracking the activities of users of the Site and e-mail recipients.
- *Interaction with Social Media Pages:* If you interact with our Social Media Pages, we may collect your social media ID, profile photo and other data that is publicly available.
- *Social Media Widgets:* The Site includes social media functions, such as the Facebook, Instagram, and Twitter widgets that you can use to access our social media pages. These features may set a cookie or use other automatic collection and tracking technologies to collect information about you and your use of the social media features through and in connection with our Site. Your interactions with the social media functions and widgets located on the Site are governed by the privacy policies of the companies that provide them. If you use any of the social media functions or widgets on this Site, we strongly suggest you review the privacy policies of the social media platforms themselves, as well as the privacy policy of the company that provides the tools to enable the sharing, which is called AddThis. AddThis's privacy policy can be found here: <https://www.oracle.com/legal/privacy/privacy-policy.html#12>.

- *Cookies*: See our [Cookies Policy](#) for a description of how cookies are used on the Site and your choices regarding cookies.

e. Sensitive Information

We ask that you not send or otherwise disclose to us through the Services your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership. Where you provide us with such information, we reserve the right to erase any such information at our discretion.

f. Information About Minors

The Services are not intended for persons under the age of 18. We do not knowingly collect Personal Information online from persons in this age group. We reserve the right to delete any information identified as having been provided by such persons at our discretion.

2. How We Use the Information We Collect

We use Personal Information submitted by you or otherwise collected through the Services and through other sources for the purposes described in this Privacy Policy and as otherwise described to you at the point of collection. Generally, we use the information you provide to us for the reason for which it was provided. For example, if you sign up to receive email notifications about our resort, we will contact you by email. If you provide us with information to inquire about a reservation, we will use the information to process your reservation. In addition, we may use Personal Information from or about you:

- i.** To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with events and to provide you with information regarding the property;
- ii.** To complete your reservation and stay, including to process payment, accommodate your preferences, provide you with requested services and amenities, and provide you with related customer service;
- iii.** To manage our contractual relationship with you, including to send you a receipt by email when you make a reservation and following your stay;
- iv.** To present you with offers tailored to your preferences, send you marketing communications and periodic customer satisfaction, market research, or quality assurances surveys, and personalizing your experience on the Site;
- i.** To send you important information regarding our relationship with you or regarding the Services, changes to our terms, conditions, and policies, and other administrative information; and
- v.** For our business purposes, such as data analysis, audits, recordkeeping, developing new products or services, enhancing and improving our Services, identifying Site usage trends, and enforcing and defending our legal rights and as otherwise required by applicable law.

We may use any information that does not personally identify you, your computer, or your device, for any purpose.

3. Our Disclosure of Your Information

We do not sell your Personal Information. We may share your Personal Information with third parties only as described in this Privacy Statement or as otherwise described at the point where we collect the information from you, including:

- i. personal information may be shared by Monteverdi Residence Club LLC with its affiliate that operates the resort in Italy, The Maria Mazzone Center for The Arts & Humanities, s.r.l., for the purposes described in this policy;
- ii. to the companies or individuals that we hire to provide services to us, such as reservation processing for us and website hosting services;
- iii. to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

4. Uses and Disclosures to Comply with Laws

In addition, we use and disclose Personal Information collected through the Site as we believe to be necessary or appropriate: (i) under applicable law, including laws outside your country of residence; (ii) to comply with legal process; (iii) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (iv) to enforce our terms and conditions; (v) to protect our operations or those of any of our affiliates; (vi) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (vii) to allow us to pursue available remedies or limit the damages that we may sustain.

5. Interest Based Advertising

As described in Section 1.c of this Privacy Policy above, Monteverdi and our third party business partners may collect information from you and your device through various technologies (such as cookies, device identifiers, pixel tags, web beacons, and other analytic technologies) to:

1. Track how you use the Site, how you arrived at the Site, and what you do after you leave the Site; and
2. Provide you with advertisements relevant to your interests, taking into account your use of the Site and the other websites and online services that you use. Note that these advertisements may be delivered to you on the Site and on third party websites and applications.

This is called “Interest-Based Advertising” or “Online Behavioral Advertising.” To learn more about Interest-Based Advertising, you can visit www.networkadvertising.org/choices, <https://www.datalogix.com/privacy>, and www.aboutads.com.

If you wish to opt-out of participating in interest-based advertising, you can use some or all of the following methods:

- Visit <http://www.aboutads.info/choices> (for web-based advertising) and <http://www.aboutads.info/appchoices> (for mobile advertising); and
- For mobile advertising, use your phone operating system’s opt-out setting (For instructions on

how to “Limit Ad Tracking” on iOS, please visit this [Apple Support Document](#); For instructions on how to opt out of interest-based ads on Android, please visit [these instructions](#)).

The easiest way to stop the collection of your personal information is to discontinue using the Site.

6. Links to Third Party Sites

The Online Services may contain links to other Web sites for the convenience of users in locating information, products, or services that may be of interest. If you access a third-party website from a link on the Online Services, any information you disclose on that website is **not** subject to this Privacy Statement. It is possible that these links may be used by third parties or others to collect personal or other information about you.

We are not responsible for the privacy practices of such websites, advertisers, or third parties or the content of such websites and it is your sole obligation to review and understand the privacy practices and policies of these other websites. We do not control these third parties’ use of cookies, collection of information, or how they manage such information. It is solely your obligation to review and understand the privacy practices and policies of these other websites, advertisers and any third parties.

7. Where Your Information is Processed

Monteverdi Residence Club LLC is based in the United States and our affiliate, The Maria Mazzone Center for The Arts & Humanities, s.r.l., is based in Italy. No matter where you are located, you consent to the processing and transfer of your Personal Information in and to the United States and Italy. The laws of the United States governing data protection may not be as comprehensive or as protective as the laws in the country where you live.

8. Security

Monteverdi will take reasonable steps to protect the information collected and provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, you should understand that no transmission over the Internet is ever fully secure. Also, Monteverdi uses reasonable efforts to ensure that the Services are generally available. However, there will be occasions when access to the Services will be interrupted or unavailable. Monteverdi will use reasonable efforts to minimize such disruption where it is within its reasonable control. You agree that Monteverdi shall not be liable to you for any modification, suspension or discontinuance of the Services.

9. Data Retention

We generally retain Personal Information for so long as it may be relevant for the purposes identified in this Privacy Policy or at the time the information is collected, unless a longer period of time is required by law or unless you ask us to delete it sooner.

3. Lawful Bases for Processing Your Personal Information

The laws in some countries require us to tell you about the lawful grounds we rely on to collect, use, disclose, and otherwise process your Personal Information. To the extent those laws apply, our lawful bases for processing your Personal Information are:

- i. To enter into and perform a contract with you: We may process Personal Information to meet our contractual obligations to you, or to take steps in anticipation of entering into a contract.

For example, we process Personal Information in order to process any reservations you make using the Services.

- ii. To comply with a legal obligation: We need to use and disclose Personal Information in certain ways to comply with our legal obligations.
- iii. For our legitimate interests, where those interests are not overridden by your fundamental rights and freedoms: In many cases, we handle Personal Information because it furthers our legitimate business. This includes:
 - Providing a safe user experience on our Online Services;
 - Providing the Services you request;
 - Customer service;
 - Personalizing the Services according to your preferences;
 - Sending communications to you to let you know about information you have told us is important to you;
 - Protecting users, our workers, and our property;
 - Analyzing and improving our operations (e.g., optimizing the design and operation of our Online Services); and
 - Managing legal issues.
- iv. With your consent: Where permitted by law, we handle Personal Information on the basis of your implied or express consent.

4. **Data Controller**

In some countries, the data protection laws require that we identify the controller of your personal information. A “controller” is the person or organization who alone or jointly determines the purposes for which, and the manner in which, any Personal Information is, or is likely to be, processed. This Privacy Policy is issued on behalf of Monteverdi Residence Club LLC, which is located at [_____], and the Maria Mazzone Center for The Arts & Humanities, s.r.l., with registered offices in Milano, Piazzetta Maurilio Bossi n. 4 – Italy, each as controllers of your Personal Information under applicable data protection laws.

12. **Your Data Rights and Choices**

The laws in some countries may give you particular rights with respect to your Personal Information, including the right to access the Personal Information that we maintain, and the right to object to certain processing of Personal Information by Monteverdi. If you would like to submit a data access, correction, restriction, or deletion request, or if you would like to object to certain processing, you can do so by contacting us by email at [privacy@monteverdituscany.com] and we will process such request with respect to any Personal Information that we are able to link to you individually based on the information that you can provide to us. These rights and options that you have with respect to Personal Information are subject to limitations and exceptions under applicable law. In addition to those rights, if you live in certain jurisdictions, you have the right to submit a complaint to your relevant supervisory authority. However, we encourage you to contact us first by emailing [privacy@monteverdituscany.com] and we will try to resolve your concerns.

Additionally, you may have the right to ask us not to process your Personal Information for marketing purposes. You can also exercise the right at any time by contacting us.

At any time, you can unsubscribe from certain emails by clicking on the “unsubscribe” link they contain. You can also opt-out of the use of certain cookie-related processing by following the instructions in our [Cookies Policy](#).

13. Our Right to Change Privacy Statement

Monteverdi reserves the right at any time to modify, alter, or update this Privacy Statement. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by E-Mail.

Your use of the Services following any changes means that you agree to follow and be bound by the Privacy Policy as changed, subject to limitations under applicable law. If you do not agree with such changes, you should stop using our Services.

Any change to this Privacy Policy shall be effective as to any user who has used the Services before the change was made, subject to any additional requirements under applicable law. Please review this policy periodically, and especially before you provide any Personal Information to us. The Privacy Policy was last updated on the date indicated above.

14. Contacting Us

Please feel free to contact us if you have any questions or concerns about this Privacy Statement or our information practices. You may contact us as follows:

Address: US: 201 East Fifth Street, 1730 PNC Center, Cincinnati, OH 45202
Italy: Via di Mezzo, Castiglioncello del Trinoro, 53047 Sarteano (SI)

Telephone: +1.513.579.2684

Email: privacy@monteverdituscany.com