

COOKIE POLICY

This extensive circular letter on personal data processing describes how the website: www.hotelcortebusiness.eu uses cookies and tracking technologies for the personal data processing of identified or identifiable users who browse in the site.

The circular contains all the elements provided by Art. 13 of the EU Regulation 2016/679 and is laid out in compliance with the General Provision of the Supervisory Authority dated 10.6.2021 (n° 231).

DATA CONTROLLER

The data controller is **Simp S.r.l.** - 02765200353, 0 - ITALY e Vat number: IT02765200353, which avails of its own processing managers or those of external processing companies.

Further information about the data processing activities performed through the website are available consulting the Privacy Policy.

The cookies or pixel trackers set by the website during the browsing session may be different depending on which browser SW is in use, cookies already stored, cache or accounts logged-in on third party websites or search engines. Cookies and tracker reported are detect in absence of these interferences.

WHAT ARE COOKIES AND THEIR PURPOSES

Cookies are small text files which the sites visited by the user set directly to user's browser, where they are stored to be then retransmitted to the sites themselves during the next visits (so-called **first-party cookies**). When surfing a site, the user may also receive on his cookies of different sites or web servers (so-called **third-party cookies**); this occurs because the web site visited may contain digital elements and contents, such as images, maps, sounds, specific links to web pages of other domains that reside on different services other than those on which the page requested is found. In other words, these are cookies that are set by a website different from the one actually visited.

The duration of the cookies may be limited to a single surfing session on the browser (so-called **session cookies**), and in this case automatically deleted when the visitor closes the browser; or they may also have a pre-set expiry and, in this case, will remain memorized and active in the user's browser up to the given expiry date, continuing to gather and transmit information during the various browsing sessions on the browser (so-called **long term** or **permanent cookies**).

Cookies are used for different functions. Some are necessary to allow you to browse on the website and use its features (so-called **technical cookies**).

Others are used to obtain statistical information, whether or not in aggregate form, on the users which surf in the website and on how the website is used (so-called **analytical cookies**). This cookie may be sent by the website even without the user specific consent, if the information collected are necessary to create aggregate statistics related to a single website or to a group of websites belonging to a single data controller (**first-party analytical cookies**). For what concerns **third-party-analytical cookies**, they must be collected in a shape in which the IP address of users is at least partially disguised, in order to preserve data confidentiality.

Lastly, they are used to track a consumer profile of the user and allow him/her to view customized advertisements on the same website or in third parties ones, which may be interesting and in line with the user's taste, consumption and browsing habits (so-called **profiling cookies**).

The website will submit this kind of cookie only after the user explicit consent provision, consent which have to be recorded through a cookie management system which has to give the user the possibility to choose whether or not to receive profiling cookies.

To learn more in detail about these different categories of cookies, please continue reading this circular. Discover how they work and their purposes, and freely choose whether to consent or block their usage (opt-in).

TECHNICAL COOKIES

Technical cookies are tools set on user's browser to allow functions, to optimize site's pages loading, to keep the login status during the browsing session or to protect both users and webserver by cyber-attack (such as, for instance, DOS attack or Cross-site request forgery – CSRF). In the following table we report the list of technical cookies sent during the browsing on our website, with info on tools origin, expiring time, functions and links to the privacy policy of cookie's provider (if available).

Name	Origin	Function	Expiring	Privacy Policy
wpzerospam_has_access	First Party		End of browsing session	
wpzerospam_ip_checked	First Party		End of browsing session	

N.B.: The expiring time of cookies which expire in less than a day it's indicated as "End of browsing session".

ANALYTICAL COOKIES

Analytical cookies are necessary to collect information and statistical data on browsing and website usage habits in order to evaluate, improve, optimize and customize the browsing experience. Without the use of this type of tool for the website owner and other web service providers would be hard to collect feedback and data useful to improve his own services. However, those cookies aren't used to create a profile of users browsing habits with the purpose to cast advertising campaigns or other marketing targeted operations, because data collected are usually encrypted, anonymized and/or aggregated. In the following table we report the list of analytical cookies sent during the browsing on our website, with info on tools origin, expiring time, functions and the link to the privacy policy of cookie's provider (if available).

Name	Origin	Function	Expiring	Privacy Policy
_ga	First Party	The cookie is used by Google Analytics to identify a user with a unique ID, in an anonymous way. It is useful to gather statistics regarding the site.	730 Days	https://policies.google.com/privacy?
_gat	First Party	Cookie used by Google Analytics to distinguish the users.	End of browsing session	https://policies.google.com/privacy?
_gid	First Party	Cookie used to identify the session.	1 Day	https://policies.google.com/privacy?

N.B.: The expiring time of cookies which expire in less than a day it's indicated as "End of browsing session".

PROFILING COOKIES

Profiling cookies have generally the purpose to track user's browsing behaviours in order to create a profile related to different parameters and to include users in smooth categories to customize adverts, search engine results and to cast advertising campaigns or other marketing targeted operations. In the following table we report the list of profiling cookies sent during the browsing on our website, with info on tool's origin, expiring time, functions and the link to the privacy policy of cookie's provider (if available).

Name	Origin	Function	Expiring	Privacy Policy
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N.B.: The expiring time of cookies which expire in less than a day it's indicated as "End of browsing session".

SOCIAL BUTTONS AND WIDGETS

Social buttons are particular icon, displayed on the website depicting the icons of social networks (example, Facebook and Twitter) or other utility services which allow users to browse and interact with a click directly with social/service platforms.

The social buttons displayed on the site are links to the website owner account on social networks depicted. By using these buttons aren't usually installed first or third-party cookies. Here below are listed the social buttons available on the website, with links to each privacy policy:

[Facebook](#), [Youtube](#), [Instagram](#), [Twitter](#), [Linkedin](#), [Pinterest](#)

Widgets are spaces where through a graphic interface the user can interact with an application/service, a software or another web site. The usage of these interfaces is subject to the terms and conditions of use of the service provider, concerning personal data too. Here is the list of widgets available on the site:

[Google Maps](#), [Youtube](#), [Vimeo](#)

PIXEL TRACKER

Pixel trackers are useful tools and technologies to deliver engaging and interlinked experiences, composed single pixel image files sent by the website during pages loading and subsequently read to collect information about site use, useful to the website owner and/or other providers for different purposes.

The tracker can use the information you submit for a different purposes, such as sending customized advertisement material, to analyze user behaviors or provide services within the site, such as access to social networks or areas comments, and other technical and security features. In most cases, the information collected are anonymized or pseudonymized. Although sometimes the personal data do not undergo such treatment, which means they can directly identify a specific user.

The use of this technology could slow down the browsing experience, and, above all, make less certain the confidentiality of user's personal information.

The website uses the following tracker:

Name	Origin	Type	Function	Privacy policy
google analytics	Google	Website analytics	This tracker collect information related to user's browsing modalities and habits in order to implement and customize offered services.	https://policies.google.com/privacy?

OPTIONAL SUBMISSION

Many of the data submissions of the user done through cookies are optional. To see how to handle cookies, according to the browser used (Edge, internet Explorer, Mozilla, Safari, Chrome), you can browse to the website aboutcookies.org to erase them, or for the same purpose you can use the tools integrated in the browser you're using following those links:

[Safari](#), [Chrome](#), [Firefox](#), [Internet Explorer](#), [Edge](#), [Opera](#)

Opera copy the following link in search bar: `opera://settings/clearBrowserData`

The user, managing the choice related to cookies, can make use of services provided by [EDAA](#) or similar services provided by other subjects. Through those tools, you can manage your preferences concerning the cookies matters for a wide part of tracking tools. Google also allow to customize the preferences on advertisement linked to your Google Account by using the following tool: <https://adssettings.google.com>

Some tracking tools will be sent by the website only after your explicit consent provision. This consent, when necessary, will be provided by choosing the different option through a banner displayed during the first access on the website. After the consent provision, the user may changes his preferences in a page on the website dedicated to cookie management choices.

If you wouldn't be tracked through cookies or other similar tracking technologies we suggest you to set the browser in "private mode" (which auto-delete browsing data stored in the browser during the session) or to delete periodically browser history, cache – partition where are stored files related to visited web pages, with the purpose to provide a faster loading of the same during following sessions – and cookies stored on the browser.

PROCESSING METHOD AND RETENTION TIME

The personal data are processed with automatized instruments, for the time strictly necessary to pursue the objectives explained earlier.

Specific security measures are adopted to prevent the loss of the data, their illicit or incorrect use and unauthorised access.

For all the information related to the third-parties who may access your data and, generally, on the data process operations performed through the website a specific Privacy Policy is available on the website.

DATA SUBJETS RIGHTS

We inform you about the existence of your rights **to access** to your personal data, **to rectify** and/or **cancel** the same, **restrict the process performed on your data**, **object** to processing activities and to request **data portability** (Articles 15 to 22 of the EU Regulations 2016/679 GDPR);

The specific complaint to the Data Controller can be presented by contacting the same e-mail address:

info@hotelcortebusiness.eu

If the data processing has his foundation on your explicit consent (art. 6, § 1, lect. a), you have the right to revoke this consent whenever you want, without to prejudice the lawfulness of previous processing activities.

You are entitled to file your complaints with the control authority at the Supervisory Authority address for the protection of personal data, by sending a certified e-mail to the address protocollo@pec.gpdp.it, or with the control authority of another EU member country.

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