

# DOTTY CAPITAL S.R.L.

## PRIVACY POLICY

Dotty Capital s.r.l. is committed to protecting your privacy and ensuring that your personal information is handled in a safe and responsible way. This policy outlines how we aim to achieve this and includes the information collected when:

- you make a booking on our website.
- you make enquiries on our website.
- you are interested in working with us.

### Definition of Personal Data

Personal Data means any data that relates to an identifiable person who can be directly/ indirectly identified from that data. In this case, it means personal data that you give to us via our site and email. By providing your personal data, you agree that we can use your personal data in accordance with this policy. Please ensure you understand this policy in its entirety and take your time to read it.

### Who are we?

The registered address of Dotty Capital s.r.l. is: Via Pian d'Erba n.5 – 22036 Erba (CO). Italy

### How do we collect information from you?

We collect information from you:

- when you make an enquiry
- when you make a booking
- when you sign up to our newsletter/marketing communications.

### What type of information is collected from you?

You may be asked to submit personal information about yourself when you make a booking request or a booking. We will collect this information so we can fulfil your request and booking.

Dotty Capital collects information such as:

- title
- name
- e-mail address (used for booking confirmation and general correspondence)
- phone number
- billing information taken for deposits, or holding credit card information for security deposits
- dietary requirements and allergy preferences once a booking has been confirmed before the start of your holiday.

### Location information:

If you use our website, we may receive your generic location (such as city or neighbourhood).

### Careers:

You may submit your CV if you're interested in working for us this information may include:

- personal details
- employment details
- education
- salary history
- other relevant details

We will use this information to assess your application. We may also keep it in our records for future reference. Please get in contact if you would no longer like us to hold your records at [info@dotty-capital.com](mailto:info@dotty-capital.com).

### How is your information used?

Our use of your personal data will always have a lawful basis, either because it is necessary to complete a booking, because you have consented to our use of your personal data (e.g. by subscribing to our newsletter/marketing communications), or because it is in our legitimate interests. We require the

information outlined in the previous section to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping.
- To send you service emails (booking confirmation, holidays planning and feedback requests).
- To improve our products and services.
- To send marketing communications if you have opted in to receive them.
- We may use the information to customise the website according to your interests.

#### **Who has access to your information?**

We will not sell, distribute, or lease your personal information to third parties. Any personal information we request from you will be safeguarded under current legislation.

#### **How and where do we store data?**

We will retain Personal Data for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Please note that we have a variety of obligations to retain the Data that you provide to us, including to ensure that transactions can be appropriately processed, settled, refunded or charged-back, to help identify fraud and to comply with anti-money laundering and other laws and rules that apply to us and to our financial service providers. There may also be residual Data that will remain within our databases and other records, which will not be removed.

#### **Your choices**

The Dotty Capital newsletter subscription is optional. We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will never pass your details to any third parties.

You may unsubscribe from our Newsletter at any time. All our Newsletters contain unsubscribe links. Alternatively, you can change your marketing preferences at any time by contacting us via email at [info@dotty-capital.com](mailto:info@dotty-capital.com).

Our newsletter is constructed, sent and analysed by MailChimp. MailChimp is a data processor in the USA. It gathers statistics on email opening, location and clicks using their technologies. MailChimp participates in and has certified its compliance with the Privacy Shield framework. They treat all personal data received from EU member countries under the Privacy Shield framework. Further details on MailChimp's compliance can be seen [here](#). You have a right to request a copy of the personal information that Dotty Capital holds

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You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

#### **Social Media Platforms**

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution in regard to their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

**Security**

Data security is very important to us, and to protect your data we have taken suitable measures to safeguard and secure data collected through our Site.

Our Site may contain links to other websites. Please note that we have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

**Changes to this statement**

Dotty Capital s.r.l. will occasionally update this Privacy Policy to reflect company and customer feedback. Dotty Capital encourages you to periodically review this statement to be informed of how we are protecting your information. This policy was last updated in November 2022.

**Contact Information**

If you have any questions, comments or concerns about our privacy practices or how we collect, handle or use your personal information please contact [info@dotty-capital.com](mailto:info@dotty-capital.com).