

Hotel Caporal Privacy Policy

Welcome to Hotel Caporal's privacy policy. This policy will help you understand what data we collect, why we collect it and what your rights are in this regard.

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Data Controller

CAPORAL SAS, owned by Valeria Apicella & Co.
VAT No. 03151230657 – REA SA-260942
Via Strada Nuova 20, 84010 Minori (SA) - Italy

Data Controller's email address: info.hotelcaporal@gmail.com

Type of Data We Collect

The Personal Data collected by this Application, either directly or through third parties, includes:

- Tracking Tools
- Usage data
- number of Users
- session statistics
- email

Full details on each type of Personal Data collected are provided in the relevant sections of this privacy policy or via specific information notices displayed prior to the collection of such Data.

Personal Data may be freely provided by the User or, in the case of Usage Data, collected automatically whilst using this Application. Unless otherwise specified, all Data requested by this Application is mandatory. If the User refuses to provide it, it may be impossible for this Application to provide the Service. Where this Application indicates that certain Data as optional, Users are free to refrain from providing such Data, without this having any impact on the availability of the Service or its functionality.

Users who are unsure as to which Data is mandatory are encouraged to contact the Data Controller.

Any use of cookies – or other tracking tools – by this Application or by the controllers of third-party services used by this Application is intended to provide the Service requested by the User, in addition to the further purposes described in this document and in the Cookie Policy.

The User assumes responsibility for any third-party Personal Data obtained, published or shared via this Application.

Methods and location of processing of the collected data

Methods of processing

The Data Controller implements appropriate security measures to prevent unauthorised access, disclosure, alteration or destruction of Personal Data.

The processing is carried out using IT and/or telecommunications tools, in accordance with organisational procedures and logic closely related to the stated purposes. In addition to the Data Controller, in some cases, other parties involved in the organisation of this Application (administrative, sales, marketing and legal staff, system administrators) or external parties (such as third-party technical service providers, postal couriers, hosting providers, IT companies,

communications agencies) who may also be appointed, where necessary, as Data Processors by the Data Controller. An up-to-date list of Data Processors may always be requested from the Data Controller.

Location

The Data is processed at the Data Controller's operational premises and in any other location where the parties involved in the processing are situated. For further information, please contact the Data Controller.

The User's Personal Data may be transferred to a country other than the one in which the User is located. For further information on the location of processing, the User may refer to the section detailing the processing of Personal Data.

Retention period

Unless otherwise stated in this document, Personal Data is processed and retained for as long as is necessary for the purpose for which it was collected and may be retained for a longer period due to any legal obligations or on the basis of the Users' consent.

Purposes of Processing the Data Collected

Users' Data is collected to enable the Data Controller to provide the Service, comply with legal obligations, respond to requests or enforcement actions, protect its rights and interests (or those of Users or third parties), identify any malicious or fraudulent activities, as well as for the following purposes:

- Statistics
- Display of content from external platforms
- Contacting the User

Details on the processing of Personal Data

Contacting the User



Contact form

Personal data processed: Usage data +1

Statistics

The services contained in this section enable the Data Controller to monitor and analyse traffic data and are used to track the User's behaviour.



Google Analytics 4

Company: Google Ireland Limited Place

of processing: Ireland

Personal data processed: Usage data +3

Display of content from external platforms

This type of service allows content hosted on external platforms to be displayed directly on the pages of this Application and to interact with it. These services are often referred to as widgets, i.e. small elements embedded in a website or application. They provide specific information or perform a particular function and often allow interaction with

the user.

However, this type of service may still collect web traffic data relating to the pages where the service is installed, even when users do not use it.



Google Fonts

Company: Google Ireland Limited Place

of processing: Ireland

Personal data processed: +1 usage data



Google Maps Widget

Company: Google Ireland Limited Place

of processing: Ireland

Personal data processed: Usage data +1

Cookie Policy

This Application uses Tracking Tools. To find out more, Users can consult the [Cookie Policy](#).

Further information for users in the European Union

Legal basis for processing

The Data Controller processes Personal Data relating to the User where one of the following conditions applies:

- the User has given consent for one or more specific purposes.
- the processing is necessary for the performance of a contract with the User and/or for the implementation of pre-contractual measures;
- the processing is necessary to comply with a legal obligation to which the Data Controller is subject;
- the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
- the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party.

In any event, you may always ask the Data Controller to clarify the specific legal basis for each instance of processing and, in particular, to specify whether the processing is based on the law, provided for by a contract or necessary for the conclusion of a contract.

Further information on retention periods

Unless otherwise stated in this document, Personal Data is processed and retained for the period required by the purpose for which it was collected and may be retained for a longer period due to any legal obligations or on the basis of Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Data Controller and the User will be retained until the performance of that contract is completed.
- Personal Data collected for purposes based on the Data Controller's legitimate interests will be retained until such interests are satisfied. The User may obtain further information regarding the legitimate interests pursued by the Data Controller in the relevant sections of this document or by contacting the Data Controller.

Where processing is based on the User's consent, the Data Controller may retain Personal Data for a longer period until such consent is withdrawn. Furthermore, the Data Controller may be obliged to retain Personal Data for a longer period

in order to comply with a legal obligation or following an order from an authority.

At the end of the retention period, the Personal Data will be erased. Consequently, upon expiry of this period, the rights of access, erasure, rectification and data portability can no longer be exercised.

User rights under the General Data Protection Regulation (GDPR)

Users may exercise certain rights in relation to the Data processed by the Data Controller. In

particular, within the limits provided for by law, the User has the right to:

- **withdraw consent at any time.** The User may withdraw their previously given consent to the processing of their Personal Data.
- **object to the processing of their Data.** The User may object to the processing of their Data where such processing is carried out on a legal basis other than consent.
- **access their Data.** The User has the right to obtain information about the Data processed by the Data Controller, about certain aspects of the processing, and to receive a copy of the Data processed.
- **to verify and request rectification.** The User may verify the accuracy of their Data and request that it be updated or corrected.
- **to obtain restriction of processing.** The User may request that the processing of their Data be restricted. In such cases, the Data Controller will not process the Data for any purpose other than storage.
- **to have their Personal Data erased or removed.** The User may request that the Data Controller erase their Data.
- **to receive their Data or have it transferred to another data controller.** The User has the right to receive their Data in a structured, commonly used and machine-readable format and, where technically feasible, to have it transferred without hindrance to another data controller.
- **to lodge a complaint.** The User may lodge a complaint with the competent data protection supervisory authority or take legal action.

Users have the right to obtain information regarding the legal basis for the transfer of Data abroad, including to any international organisation governed by international law or established by two or more countries, such as the UN, as well as regarding the security measures adopted by the Data Controller to protect their Data.

Details on the right to object

Where Personal Data is processed in the public interest, in the exercise of official authority vested in the Data Controller, or to pursue a legitimate interest of the Data Controller, Users have the right to object to the processing on grounds relating to their particular situation.

Users are advised that, should their Data be processed for direct marketing purposes, they may object to such processing at any time, free of charge and without providing any reason. Should Users object to processing for direct marketing purposes, their Personal Data will no longer be processed for such purposes. To find out whether the Data Controller processes Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise your rights

Any requests to exercise the User's rights may be addressed to the Data Controller via the contact details provided in this document. The request is free of charge and the Data Controller will respond as soon as possible, and in any event within one month, providing the User with all the information required by law. Any rectifications, erasures or restrictions on processing will be communicated by the Data Controller to each of the recipients, if any, to whom the Personal Data has been disclosed, unless this proves impossible or involves a disproportionate effort. The Data Controller shall inform the User of such recipients upon request.

Further information on the processing

Defence in legal proceedings

The User's Personal Data may be used by the Data Controller in legal proceedings or during the preparatory stages leading to such proceedings to defend against any misuse of this Application or the related Services by the User. The User acknowledges that the Data Controller may be obliged to disclose the Data in response to a request from public authorities.

Specific notices

At the User's request, in addition to the information contained in this privacy policy, this Application may provide the User with additional, context-specific information regarding specific Services, or the collection and processing of Personal Data.

System logs and maintenance

For operational and maintenance purposes, this Application and any third-party services it uses may collect system logs, i.e. files that record interactions and may also contain Personal Data, such as the User's IP address.

Information not contained in this policy

Further information regarding the processing of Personal Data may be requested at any time from the Data Controller using the contact details provided.

Changes to this privacy policy

The Data Controller reserves the right to make changes to this privacy policy at any time by notifying Users on this page and, where possible, within this Application, as well as, where technically and legally feasible, by sending a notification to Users via one of the contact details held by the Data Controller. Please therefore check this page frequently, referring to the date of the last update shown at the bottom.

Should the changes relate to processing activities for which consent forms the legal basis, the Data Controller will seek the User's consent again, if necessary.

Definitions and legal references

Personal Data (or Data)

Personal data is any information which, directly or indirectly, including in conjunction with any other information, such as a personal identification number, identifies or makes a natural person identifiable.

Usage Data

This refers to information collected automatically via this Application (including from third-party applications integrated into this Application), such as: the IP addresses or domain names of the computers used by the User connecting to this Application, the URI (Uniform Resource Identifier) addresses, the time of the request, the method used to forward the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful, error, etc.), the country of origin, the characteristics of the browser and operating system used by the visitor, various time-related details of the visit (for example, the time spent on each page) and details regarding the path followed within the Application, with particular reference to the sequence of pages viewed, and parameters relating to the User's operating system and computing environment.

User

The individual using this Application who, unless otherwise specified, is the Data Subject.

Data Subject

The natural person to whom the Personal Data relates.

Data Processor (or Processor)

The natural person, legal entity, public administration or any other body that processes personal data on behalf of the Data Controller, as set out in this privacy policy.

Data Controller (or Controller)

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data and the measures adopted, including the security measures relating to the operation and use of this Application. Unless otherwise specified, the Data Controller is the owner of this Application.

This Application

The hardware or software tool through which Users' Personal Data is collected and processed.

Service

The Service provided by this Application as defined in the relevant terms (if any) on this website/application.

European Union (or EU)

Unless otherwise specified, any reference to the European Union in this document is deemed to extend to all current member states of the European Union and the European Economic Area.

Cookies

Cookies are tracking tools consisting of small pieces of data stored within the User's browser.

Tracking Tool

A Tracking Tool refers to any technology – e.g. cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting – that enables Users to be tracked, for example by collecting or storing information on the User's device.

Legal References

Unless otherwise specified, this policy applies exclusively to this Application.

How can we help?

What you can do

Your data

- [Ask us to tell you what information we hold about you and to access it](#)
- [Ask us to correct the information we hold about you](#)
- [Ask us to exercise your right to be forgotten \(by deleting the information we hold about you\)](#)
- [Ask us to transfer your data to another service](#)

If you have any problems

Although we are committed to providing a positive user experience, we recognise that issues may occasionally arise between us and our users.

In that case, please do not hesitate to

contact us. [Contact us](#)

Footer

Hotel Caporal

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Downloadable documents

- [Privacy Policy](#) _
Last updated: 16 April 2026
- [Cookie Policy](#) _
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