

This Application collects some Personal Data from its Users.

Owner and Data Controller

Well.com Srl - Restaurant Grissino
Via Mercato Vecchio 28/B
39042 Bressanone
Italy
VAT / tax no.: IT01500190226
Owner contact email: info@acquarena-well.com

Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage Data and email address.

Complete details on each type of Personal Data collected are provided in the dedicated sections of this privacy policy or by specific explanation texts displayed prior to the Data collection.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”),

without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;

- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for. Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Services, as well as for the following purposes: Displaying content from external platforms, Interaction with external social networks and platforms,

Remarketing and behavioral targeting, Analytics, SPAM protection, Tag Management, Handling payments and Managing landing and invitation pages.

Users can find further detailed information about such purposes of processing and about the specific Personal Data used for each purpose in the respective sections of this document.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

Analytics

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Facebook Ads conversion tracking (Facebook, Inc.)

Facebook Ads conversion tracking is an analytics service provided by Facebook, Inc. that connects data from the Facebook advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Google AdWords conversion tracking (Google Inc.)

Google AdWords conversion tracking is an analytics service provided by Google Inc. that connects data from the Google AdWords advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

Google Analytics with anonymized IP (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

This integration of Google Analytics anonymizes your IP address. It works by shortening Users' IP addresses within member states of the European Union or in other contracting states to the Agreement on the European Economic Area. Only in exceptional cases will the complete IP address be sent to a Google server and shortened within the US.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

Handling payments

Payment processing services enable this Application to process payments by credit card, bank transfer or other means. To ensure greater security, this Application shares only the information necessary to execute the transaction with the financial intermediaries handling the transaction.

Some of these services may also enable the sending of timed messages to the User, such as emails containing invoices or notifications concerning the payment.

PayPal (PayPal Inc.)

PayPal is a payment service provided by PayPal Inc., which allows Users to make online payments.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

SOFORT (SOFORT GmbH)

SOFORT is a payment service provided by SOFORT GmbH.

Personal Data collected: various types of Data as specified in the privacy policy of the service.

Place of processing: Germany – [Privacy Policy](#).

Managing landing and invitation pages

This type of service helps with building and managing landing and invitation pages, i.e., pages for presenting a product or service, where you may add your contact information such as an email address.

Managing these pages means that these services will handle the Personal Data collected through the pages, including Usage Data.

Unbounce (Unbounce Marketing Solutions Inc.)

Unbounce is a landing page management service provided by Unbounce Marketing Solutions Inc., that allows this Application to collect the email addresses of Users interested in its service.

Unbounce allows the Owner to track and analyze the User response concerning web traffic or behavior regarding changes to the structure, text or any other component of the created landing pages.

Personal Data collected: Cookies, email address and Usage Data.

Place of processing: Canada – [Privacy Policy](#).

SPAM protection

This type of service analyzes the traffic of this Application, potentially containing Users' Personal Data, with the purpose of filtering it from parts of traffic, messages and content that are recognized as SPAM.

Google reCAPTCHA (Google Inc.)

Google reCAPTCHA is a SPAM protection service provided by Google Inc.

The use of reCAPTCHA is subject to the Google [privacy policy](#) and [terms of use](#).

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Displaying content from external platforms

This type of service allows you to view content hosted on external platforms directly from the pages of this Application and interact with them.

This type of service might still collect web traffic data for the pages where the service is installed, even when Users do not use it.

YouTube video widget (Google Inc.)

YouTube is a video content visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Vimeo video (Vimeo, LLC)

Vimeo is a video content visualization service provided by Vimeo, LLC that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#).

ilMeteo widget (ilMeteo srl)

ilMeteo widget is a content visualization service provided by ilMeteo and ilMeteo srl.

Personal Data collected: Usage Data.

Place of processing: Italy – [Privacy Policy](#).

Google Fonts (Google Inc.)

Google Fonts is a typeface visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Usage Data and various types of Data as specified in the privacy policy of the service.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Google Maps widget (Google Inc.)

Google Maps is a maps visualization service provided by Google Inc. that allows this Application to incorporate content of this kind on its pages.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Interaction with external social networks and platforms

This type of service allows interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

AddThis (Addthis Inc.)

AddThis is a service provided by Clearspring Technologies Inc., which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of this Application.

Depending on the configuration, this service can display widgets belonging to third parties such as the managers of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#).

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

PayPal button and widgets (PayPal Inc.)

The PayPal button and widgets are services allowing interaction with the PayPal platform provided by PayPal Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: See the PayPal privacy policy – [Privacy Policy](#).

Pinterest "Pin it" button and social widgets (Pinterest)

The Pinterest "Pin it" button and social widgets are services allowing interaction with the Pinterest platform provided by Pinterest Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#).

ShareThis (Sharethis Inc.)

ShareThis is a service provided by ShareThis Inc., which displays a widget that allows interaction with social networks and external platforms as well as sharing the contents of this Application.

Depending on the configuration, this service can display widgets belonging to third parties such as the managers

of social networks where interactions are shared. In this case, also the third parties that provide the widget will be informed of interactions and Usage Data on the pages where this service is installed.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#).
Twitter Tweet button and social widgets (Twitter, Inc.)

The Twitter Tweet button and social widgets are services allowing interaction with the Twitter social network provided by Twitter, Inc.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

Remarketing and behavioral targeting

This type of service allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity.

In addition to any opt out offered by any of the services below, the User may opt out of a third-party service's use of cookies by visiting the [Network Advertising Initiative opt-out page](#).

AdWords Remarketing (Google Inc.)

AdWords Remarketing is a remarketing and behavioral targeting service provided by Google Inc. that connects the activity of this Application with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#).
Facebook Remarketing (Facebook, Inc.)

Facebook Remarketing is a remarketing and behavioral targeting service provided by Facebook, Inc. that connects the activity of this Application with the Facebook advertising network.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#) – [Opt Out](#). Privacy Shield participant.

Tag Management

This type of service helps the Owner to manage the tags or scripts needed on this Application in a centralized fashion.

This results in the Users' Data flowing through these services, potentially resulting in the retention of this Data.
Google Tag Manager (Google LLC)

Google Tag Manager is a tag management service provided by Google LLC.

Personal Data collected: Cookies and Usage Data.

Place of processing: United States – [Privacy Policy](#). Privacy Shield participant.

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.

- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.
-

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How “Do Not Track” requests are handled

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.