



hotel domenichino

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www.hoteldomenichino.com | privacy@hoteldomenichino.com

**Information to data subjects
as per section 13 of
the personal data protection code
legislative decree 196/03**

HOTEL CUSTOMERS



INFORMATION TO DATA SUBJECTS AS PER SECTION 13 OF THE PERSONAL DATA PROTECTION CODE - LEGISLATIVE DECREE 196/03

The company HOTEL DOMENICHINO S.p.A., in its capacity as “data controller”, informs you that personal data provided by you or in any case collected for purposes connected with execution of the contractual relationship will be treated, also with the aid of electronic and/or automated equipment, in compliance with Legislative Decree 196/03 (Personal Data Collection Code), in accordance with principles of lawfulness and fairness, and in such a way as to protect your confidentiality and the rights to which you are entitled. In particular, we wish to inform you of the following:

1. PURPOSES OF THE PROCESSING

The HOTEL DOMENICHINO collects and processes the personal data of the data subjects to whom this information sheet is addressed in order to carry out the obligations deriving from the hospitality services offered, including the contractual or pre-contractual relationships established with the clientele, for the following purposes in particular:

- a. performance of legal obligations for law enforcement in regard to hotel activities as per Article 109 of the Consolidated Public Security Act (Royal Decree 773 of 1931);
- b. accounting and tax obligations;
- c. obligations deriving from the undertaking of contractual obligations in your regard;
- d. historical archiving of the data;
- e. periodic sending of documentation on rate updates and special offers;
- f. services connected to hospitality, such as the reception of mail, messages and phone calls to you.

The provision of the data for points a), b), c), d) is:

- Obligatory for achieving the purposes connected with the obligations laid down by laws or other binding regulations;
- Necessary for properly establishing and furthering the relationship established with you.

Your refusal to provide the above data, while legitimate, might compromise the hotel’s ability to provide the requested hospitality service.

Provision of data for points e) and f) is optional and requires your explicit consent as data subject. You may object to the processing for the indicated purpose, either completely or in part, at any time.

2. COMMUNICATION TO THIRD PARTIES AND DISSEMINATION

Achieving the aforesaid aims may also take place by means of the transmission and communication of data to third parties. Such third parties are authorised for the related processing of the data in their capacity as persons in charge of the processing or external data processors in order to carry out or provide, guaranteeing the protection of the rights of the data subject, specific services that are strictly functional to the execution of the contractual relationship, such as:

- Law enforcement, oversight services, banks and credit institutions;
- Consultants and professionals, also in associated form;
- Insurance companies;
- Subjects who provide technological services to the HOTEL DOMENICHINO.

3. DISSEMINATION AND TRANSBORDER DATA FLOWS

Your personal data will not be transferred or disseminated abroad.



4. SENSITIVE DATA

The processing of customers' data may have as subject, exclusively for the protection of the data subject, personal data of a sensitive nature (i.e. data "allowing the disclosure of racial or ethnic origin, religious, philosophical or other beliefs, political opinions, membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character, as well as personal data disclosing health and sex life"). In this case the data subject's consent must be expressed in writing.

5. PROCESSING MECHANISMS

The HOTEL DOMENICHINO processes data subjects' personal data lawfully and fairly and in a manner that ensures confidentiality and security. The treatment and retention of the data is performed by means of manual and automated equipment using organisational methods and logics closely correlated with the indicated purposes.

In particular, all technical, informational, organizational, logistics and procedural security measures will be adopted, as provided by Legislative Decree 196/2003 and "Annex B" of the same Decree, in such a way as to guarantee the minimum level of protection of the data required by law. In addition, the methods applied ensure that access to the data is permitted solely to the persons entrusted with the processing by our Company or third parties appointed as data processors.

6. RIGHTS OF THE DATA SUBJECT

The HOTEL DOMENICHINO guarantees the exercise of the rights foreseen by Section 7 of the Personal Data Protection Code. The Code recognises a number of important rights, such as that of obtaining, via the data controller, and without delay:

- confirmation as to whether or not personal data concerning you exist, as well as of the logic and purposes on which the processing is based;
- erasure, anonymization or blocking of data that have been processed unlawfully;
- updating, rectification or, if you are interested therein, integration of the data;
- certification to the effect that the above operations have been notified to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.

Section 7 also guarantees the right:

- to object, in whole or in part, on legitimate grounds, to the processing of personal data concerning you;
- to object, in whole or in part, to the processing of personal data concerning you where it is carried out for the purposes of commercial information or sending advertising materials for direct selling or for performing market or interactive commercial communication surveys, and to be informed by the data controller, not later than the moment in which the data are communicated or disseminated, of the possibility of exercising such right free of charge.

7. DATA CONTROLLER AND DATA PROCESSOR

The data controller is the company **HOTEL DOMENICHINO SpA**, Via Domenichino, 41 20149 MILAN.

The list of the processors of the data that concern you is available at the HOTEL DOMENICHINO and can be requested by writing to the e-mail address: privacy@hoteldomenichino.it.

For further information in regard to personal data processing mechanisms, requests for confirmation of the existence of personal data, and requests for rectification or erasure of personal data, please send an e-mail to the address privacy@hoteldomenichino.it, clearly indicating the information or action requested.



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HOTEL SUPPLIERS



REPORT UNDER ARTICLE 13 OF LAW DECREE 196 OF JUNE 30: CODE PERTAINING TO PROTECTION OF PERSONAL DATA

The Company HOTEL DOMENICHINO JSCo, in its capacity as "Party Responsible for Management", informs you that personal data, either furnished by you or gathered in any other way for purposes connected to the execution of the Order/Agreement/Contract between the parties, will be managed, including by electronic means and/or automated means, under the terms of Legislative Decree No. 196/03, "Code Pertaining to Protection of Personal Data," according to principles of legality and correctness, and in a manner which protects your rights and confidentiality. In particular, we want to inform you of the following:

1. PURPOSE OF MANAGEMENT

HOTEL DOMENICHINO collects and manages the personal data of parties involved, to whom this report is directed, for the implementation of obligations derived from contractual or pre-contractual relationships established with the act of furnishing, in particular;

- (a) implementations arising from normative obligations, except those of accounting and taxes;
- (b) implementations arising from the assumption in your meeting of contractual obligations;
- (c) historical archiving of data.

The conferral of data is:

- Obligatory for achieving the purpose connected to obligations foreseen in the laws or from other normative binding agreements;
- Necessary for the correct establishment and continuation of the relationship established with you.

A possible refusal to furnish the data mentioned above, even if legitimate, could compromise the regular functioning of the relationship with our company and, in particular, could make it impossible for HOTEL DOMENICHINO to complete acquisition orders to suppliers and to make use of the performance of requested services and related invoicing.

In the sense of Article 24 of the code pertaining to the management of personal data, the management of your data can be implemented, limited to the purposes listed above, without your consent.

2. COMMUNICATION TO THIRD PARTIES AND DIFFUSION

The attainment of the aforementioned purpose may also occur by means of transmission and communication of data to third parties, meaning such third parties authorized to perform the correlated management of the same data, with regard to people in charge or external parties responsible for management, to carry out or to supply, with guarantee of protection of the rights of the associated party, specific services strictly necessitated by the execution of the contractual relationship, that is:

- banks and credit institutions;
- consultants and freelance professionals, even if part of a group;
- insurance enterprises;
- subjects furnished by technology services whose support services are utilized by HOTEL DOMENICHINO.

The names and addresses of such subjects, named and authorized in advance by the HOTEL DOMENICHINO, are available on request of parties involved.

3. Diffusion and Transferring of data abroad

Your personal data will not be transferred or diffused abroad.

3. SENSITIVE DATA

The management of data of parties involved will not have as its object data of a sensitive nature, in the senses of Article 4, Comma 1, Letter d) ("sensitive data") and of Article 26 ("Guarantees for sensitive data") of the Code, that is, data "which could reveal racial origins and ethnicity, religious, philosophical or other convictions, political opinions, party affiliation, unions, associations or organizations of a religious, philosophical, political, or union nature, nor personal data which could reveal state of health or sex life".



4. METHOD OF MANAGEMENT

HOTEL DOMENICHINO manages the personal data of parties involved in a lawful and correct manner in order to insure its confidential nature and security. Management is carried out in an organized manner, by means of instruments both manual and automated, and with reasoning strictly correlative to the indicated purpose.

In particular, all security measures -- technical, computational, organizational, logistical and procedural -- will be adopted, as determined in Legislative Decree 196/2003 and "Attachment B" of the same decree, in a manner which guarantees the minimum level of protection of the data required by law.

Also, the methodologies applied guarantee that access to the data is allowed only to persons entrusted by our company to manage the data.

5. RIGHTS OF PARTIES INVOLVED

The HOTEL DOMENICHINO guarantees the exercise of rights covered by Article 7 of the cited Code, which recognizes some significant rights, including those of obtaining from the responsible party, without delay:

- the confirmation of the existence or lack thereof of personal data regarding yourself, as well as the logic and purpose on which the management of data is based;
- the cancellation, the transformation into anonymous form, or the blocking of managed data in violation of law;
- the updating, that is, the correction, or, if there is interest, the integration of data;
- the declaration that the aforementioned operations were carried out with the knowledge of those to whom the data were communicated and diffused, except where fulfillment of such is found to be impossible or requires the use of means manifestly disproportionate with respect to the right of protection.

In the sense of Article 7, the right of the following is guaranteed:

- to oppose, in full or in part, for legitimate reasons, to the management of personal data regarding yourself
- for commercial ends or direct sales mailings, that is, the search for markets or for interactive commercial communication. You have the right to be informed by the manager, prior to the moment in which the data is communicated or diffused, of the possibility of freely exercising such right.

6. PROPRIETOR AND SUPERVISOR

Proprietor of personal data management is the company HOTEL DOMENICHINO JSCo, Via Domenichino, 41 20149 MILANO; The list of parties responsible for the management of your own personal data is available from the HOTEL DOMENICHINO and can be requested by e-mail: privacy@hoteldomenichino.it

For requests regarding the manner of personal data management, confirming the existence of personal data, or correction or cancellation of personal data, please send an e-mail to privacy@hoteldomenichino.it, clearly indicating the information or the action requested.