

## Privacy Policy according to EU Regulation 2016/679

Rimini Suite Hotel (hereinafter referred to, for the sake of simplicity, as “RSH”) is committed to safeguarding your personal data to the greatest possible extent. Here below you can find our privacy informative, which describes the manner in which we collect and process your personal data. This policy conforms to Legislative Decree of 30<sup>th</sup> June 2003, n° 196 (Privacy Code) and to the New EU Regulation 2016/679 (GDPR). Should you need any clarification, please contact our Reception or write us as indicated below.

Furthermore, we wish to inform you that the privacy policy of RSH may be subject to modifications following on from the issuing of new regulations and/or the introduction of new services. We therefore invite you to periodically check for any privacy policy modifications/updates on our Website.

### **1. What is a personal data**

We would like to inform you as to the meaning of personal data, which refers to any information by means of which it is possible to identify, or to render identifiable with reasonable ease, a physical person (hereinafter referred to, for the sake of simplicity, as “Data”).

### **2. What is a processing**

The processing of Data includes the following operations: collection, registration, organisation, conservation, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of Data.

### **3. What Data do we process**

RSH processes the Data such as name, surname, date and place of birth, address, credit cards data, tax code, pictures that you communicate to us for example in relation to the execution of a reservation, the invoice issuance, for the purpose of reply to information or quotations requests or collected during your stay. Should you provide us with the Data of third parties (including those of individuals of less than 14 years of age), you will be required to take all necessary steps to ensure that the communication of the Data to the Controller and our consequent processing of the same comply with the applicable provision. Therefore, for example, before providing us with the Data of third parties, you should duly inform such parties and obtain their consent to processing, if required by the aforementioned provision.

### **4. Why do we process Data**

RSH collects and processes Data to the extent strictly necessary for a number of purposes, such as:

- a) To complete necessary precontractual activities (e.g. sending of quotations, precontractual agreements, verification of credit rating and solvency);
- b) To carry out contractual and taxation obligations towards yourself;
- c) To protect our assets and/or defend our rights on the basis of our legitimate interests (e.g. collecting pictures through video surveillance system, for which a specific policy has been prepared);
- d) To fulfil legal requirements and comply with requests of authorities, as well as to comply with fraud and money laundering prevention provisions, etc.;
- e) To reply to requests sent via email or via the Website form;
- f) To evaluate the profile of candidates and select the same, where these have sent curricula of their own free choice;
- g) To send you information relating to services that you previously purchased.

Should you provide us with your express consent, we will process your Data in order to:

- h) Carry out direct marketing through both traditional and automated processes (e.g. newsletter),
- i) Transfer or communicate your Data to third parties. Said third parties shall process your Data in order to market their products or services to You. In particular, your Data might be communicated to companies

operating in the following sectors: health / medical care, hospitality and sport.

j) Analyse your behaviours and preferences.

## **5. How do we process Data**

RSH processes Data in both printed and electronic form. In such context, RBH will guarantee the logistic and physical security of the Data and, in general, the confidentiality of the Data processed, by taking all necessary technical and organisational measures.

## **6. Where is your Data stored and where is it transferred to**

The Data is processed at the operative premises of the Controller (see par. 8 which follows) as well as in any other place where the parties involved in the processing are located. The Data is held in electronic form on servers located within the European Union. In all cases, it should be understood that RSH, should it prove necessary, will have the faculty to move the server to non-EU countries. In such case, RSH guarantees from hereon in that the transfer of Data outside of the EU will take place in accordance with applicable legal provisions following on from the stipulation of standard contractual clauses provided for by the European Commission or in conformity with the Privacy Shield, in relation to those countries that do not, according to the European Commission, offer adequate provisions.

## **7. Obligation to provide Data or consent, if required**

The provision of Data for the purposes set out in clause 4 letters a) – d) is obligatory. Should it not be provided then contract execution or reservation acceptance.

The provision of Data for the purposes set out in clause 4 letters e) - j) is instead optional. Therefore, you may decide not to provide Data or to successively deny the possibility to process previously-supplied Data. In relation to the purposes for which explicit consent is requested from yourself, failure to provide consent does not constitute a valid reason for the Controller to withdraw from a contract or to not fulfil your requests in relation to other purposes. Please note that you can revoke, at any time, any possibly consent already given, by contacting us in the manner reported below.

## **8. Who is the controller, the processor the authorized persons in your Data processing**

The Controller of your Data is Saragoni Donatella e C. S.A.S. Rimini Suite Hotel, located in Viale XXV Marzo 1831, 19, 47922 – Rimini (RN), Vat code: IT 03977360407, contact details: e-mail [info@rminisuitehotel.it](mailto:info@rminisuitehotel.it), telefax +39.0541.737040, ph. +39.0541.732518. You should refer to the Controller for any information as to this privacy policy or in order to exercise your rights, as described in clause 12.

RHS is not, in accordance with art. 37 and subsequent articles of the New Regulation, obliged to nominate a DPO (Data Protection Officer).

An updated list of the processors and of the other persons responsible for processing, including nominated professionals, is held at the legal premises of the Controller.

## **9. Who is your Data communicated to**

Without having to obtain your express consent, RSH may communicate your Data, for the above referred to purposes, to prefectures, insurance supervision institutes (such as IVASS), judicial authorities, insurance companies (for the provision of insurance-related services), as well as to parties to which such communication is required by law for the fulfilment of the afore-mentioned purposes. Said parties will process the Data as autonomous controllers. Your Data will not be disclosed without previous and explicit consent.

## **10. Who can access your Data**

Your Data may be made accessible for the purposes stated in previous clause 4:

- To employees and collaborators of the Controller (e.g. reception personnel or hotel manager), in their role as persons responsible for processing and/or internal processors and/or system administrators;
- To third parties or other parties (such as, for example, travel agencies, credit institutes, professional offices, consultants, insurance companies for the provision of insurance services, etc.) that carry out activities which have been outsourced by RSH, in their role as external processors.

## **11. How long do we hold your data for**

Your Data will be held in accordance with the principles of proportionality and necessity, and until the purposes for which it was collected have been fulfilled. In particular, RBH process Data for the entire duration of its services contracts and for as long as there will be obligations or fulfilment related to the latter.

After the end of the contractual relationship your Data will be held for a period of 11 (eleven) years, in order to fulfil specific legal obligations or our legitimate interest, such as Data managing in hypothesis of any contestations or claims.

Your Data will be cancelled automatically 11 (eleven) years after the end of the contractual relationship.

## **12. What are your rights**

As the interested party, you have the right to:

- a) Know if the Controller holds and/or processes your Data, obtaining information relative to the: origin, category, purposes and method of processing, the recipients to whom such data can be communicated, the logic applied in the case of processing carried out by electronic means, the period for which data is held; as well as the right to access the same in its entirety and obtain a copy (art. 15 **Right of access**);
- b) Have rectified Data that relates to yourself and to complete Data which is incomplete (Art. 16 **Right to rectification**);
- c) Obtain the cancellation of Data in possession of the Controller where such cancellation is provided for by the New Regulation (art. 17 **Right to erasure – Right “to be forgotten”**);
- d) Request the Controller to limit the processing to only certain Data, where this is provided for by the New Regulation (Art. 18 **Right to restrict processing**);
- e) Be informed as to who the recipients to whom any rectifications, cancellations or processing restrictions have been communicated are (art. 19 **Obligation of notification**);
- f) Request and receive all your Data, in a format that is structured, commonly used and readable on an automatic device or to request its transmission to another controller without impediment (Art. 20 **Right to portability**);
- g) Oppose entirely or in part, the processing of Data for the purposes of marketing (sending of advertising material, direct sales, market research and commercial communications) and for the purposes of profiling connected to such marketing (art. 21 **Right of opposition**).

Finally, you have the right to present a claim/petition directly to the Personal Data Protection Authority, located at Piazza di Montecitorio n°. 121 – 00186 ROME, Italy tel. (+39) 06.696771 and Fax: (+39) 06.69677.3785. The exercise of the rights set forth in this paragraph is completely free of charge.

## **13. How can you exercise your rights**

At any time, you may exercise your rights by contacting the Controller at the contact details indicated in previous clause 8, by sending a registered letter with return receipt, a telefax or an e-mail or by phone.