

## **Welcome to the Privacy Policy of Savoy Hotel – S.I.S.A. srl and Granet Restaurant & Terraces – Ristorante Savoia srl**

The Savoy Hotel – S.I.S.A srl and the Granet Restaurant & Terraces – Ristorante Savoia srl (collectively referred to as “Savoy”), takes the issue of safeguarding your privacy seriously. We are committed to preserving the privacy, integrity and security of the personal information we hold about our customers and those who make contact with us. We have developed this Privacy Policy to explain how we manage and use this personal information and to ensure we comply with our legal obligations, under applicable data protection laws, according to the GDPR 679/2016. Our privacy policy (“Privacy Policy”) describes what information we collect from Savoy guests, renters and exchange guests (collectively referred to as “Guests”) as well as visitors to the Savoy web site and mobile App, and the way in which Savoy uses this information to better serve the needs of our Guests.

All of the distinct legal entities that manage and operate in the Savoy, have adopted this Privacy Policy. Those entities include Hotel Savoy and its direct and indirect subsidiaries and affiliates. Depending on the context the references throughout this Privacy Policy to “we” or “us” refer collectively to those separate and distinct legal entities.

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the “Online Services” and, together with offline channels, the “Services.” By using the Services, you agree to the terms and conditions of this Privacy Statement

### **What is the ‘Personal Information’ and the collection process?**

“Personal Information” is information that identifies you as an individual or relates to an identifiable individual. We may collect Personal Information such as:

- Name, gender, home and work address, telephone number and email address, your business title, date and place of birth, nationality, passport, visa or other government-issued identification information;
- Guest stay information, including the hotels where you have stayed, date of arrival and departure, goods and services purchased, special requests made, information and observations about your service preferences (including room type, facilities, holiday preferences, amenities requested, ages of children or any other aspects of the Services used);
- Telephone numbers dialled, faxes sent/received or receipt of telephone messages when connected to the telephone services we may provide guests during their stay;
- Credit and debit card number;
- Savoy Membership Program’s information, online user accounts details, profile or password details and any frequent flyer or travel partner program affiliation;
- Employer or other relevant details if you are an employee of a corporate account, a vendor or other type of business partner (e.g., travel agent or meeting and event planner);
- Additional contact information about you that we may obtain through third parties with whom we do business (e.g. travel agents or similar providers);
- Profile picture;
- Social media account ID or user ID;

**If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement..**

Our service providers and we may collect Personal Information in a variety of ways, including:

**Through Our Online Services: :**

We may collect Personal Information when you make a reservation or otherwise purchase goods and services from us, communicate with us via online chat services, inform us of any special requests or preferences you may have, or sign up for a newsletter or participate in a survey, contest, or promotional offer.

**Through Our Offline Services:**

We may collect Personal Information from you offline, such as when you visit one of our branded properties, make a reservation over the phone or contact customer service.

**From Other Sources:**

We may receive your Personal Information from other sources, such as public databases, joint marketing partners, and other third parties. This may include information from your travel agent, airline, credit card, and other partners, and from social media platforms (including from people with whom you are friends or otherwise connected). For example, if you elect to login to, connect with or link to, the Online Services using your social media account, certain Personal Information from your social media account will be shared with us, which may include Personal Information that is part of your profile or your friends' profiles.

**From Authorized Licensees:**

Savoy may from time to time enter into a license or similar agreement with a third party to sell products and services under its label. Such an "Authorized Licensee" is independent from the Savoy. Examples of Authorized Licensees include entities such as Blastness srl (the operator of the Savoy web site and its services) or like PromoInside the developer of Savoy App.

## **Why is Personal Information Collected and their use?**

### **1.- To Provide Superior Customer Service to our Guests**

Your Personal Information is collected to assist us in making your reservation and providing the services you request, to ensure we meet your needs while you are staying with us and/or to allow us to contact you in relation to matters that arise from your stay with us. Our goal is to provide you with superior customer service, whether you stay with us once or many times. By keeping, certain stay related Personal Information on file, such as information regarding guest history and itemized spending, Guests have the ability to confirm prior transactions and reconcile statements or invoices as well as having personal commercial treatments.

**For our business purposes, such as data analysis, audits, security and fraud monitoring and prevention (including through the use of TVCC, card keys, and other security systems), developing new products, enhancing, improving or modifying our Services, to send administrative information and quality assurance surveys, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.**

### **2.- To Keep Our Guests Informed**

We may use the Personal Information you provide and that we collect from our business partners to send you newsletters regarding our properties and to advise you of promotions or to inform you of offers or other information that may be of interest to you as well as internal market research, direct promotional offers (Marketing to You Program), periodic customer satisfaction.

To personalize your experience when you stay in Savoy and/or within its direct and indirect subsidiaries and affiliates and with respect to the Online Services by presenting products and offers tailored to you.

In order to do this, your information may be shared with a third party, for example, a customer relationship management company and/or a marketing and communications company. These companies are under contract with Savoy and are contractually required to protect all Personal Data to which they have access.

If you do not wish to receive from Savoy the information described above, you may indicate your wishes on your registration card when you stay with us or you may advise one of our properties or send an e-mail to: [privacy@savoy.it](mailto:privacy@savoy.it)

### **3.- For Marketing Research**

Finally, we may wish to contact Guests to conduct surveys or focus groups to receive your views of our properties and service delivery.

**To allow you to participate in sweepstakes, contests and other promotions and to administer these activities.**

Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information. We suggest that you read any such rules carefully.

A third party under contract may collect such information with us and they will be contractually required to protect your Personal Information as explained below.

Occasionally we will combine information from a number of Guests to understand better trends and

Guest expectations. When this occurs, the Personal Information identifiers are removed and the aggregate information cannot be linked to any specific Guest.

If you do not wish to receive from Savoy the information described above, you may indicate your wishes on your registration card when you stay with us or you may advise one of our properties or send an e-mail to: [privacy@savoy.it](mailto:privacy@savoy.it)

## **Disclosure of personal information**

Your Personal Information may be disclosed in connection with the following services that we provide as a global hotel company:

### **Reservations:**

The Personal Information you provide to us for making a reservation is made available for the purpose of meeting your reservation request. After your stay, we retain your Personal Information including details of your stay, preferences, room/accommodation type and amenities used.

### **To Service Providers:**

We may disclose Personal Information to our third-party service providers who provide services such as spa and restaurants within our hotel, website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services.

### **To Authorized Licensees:**

We may disclose your Personal Information to an Authorized Licensee in connection with the Services, including with respect to a reservation you book through us, in connection with offerings of Travel Related Services. Please note that, if you visit a website operated by an Authorized Licensee, any Personal Information you provide through that website will be subject to the privacy policy of that Authorized Licensee and not to this Privacy Statement.

### **Travel Related Services:**

We may share your Personal Data with select third parties with whom we have agreements allowing them to offer our products to you. For example, this sharing enables these third parties to provide you with a single source for purchasing packages that include other travel-related services such as airline tickets or rental cars. Please note that this Privacy Statement does not address any information you subsequently provide directly to one of these third parties, such as information necessary to reserve a rental car.

### **Internal Contests development and other Promotions.**

### **Through Social Media:**

We may disclose your Personal Information to your friends associated with your social media account, to other website users and to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your Online Services account or log-into your Online Services account from your social media account. By connecting your Online Services account and your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media site's privacy policy. If you do not want your Personal Information shared with other users or with your social media account provider, please do not connect your social media account with your Online Services account and do not participate in social sharing on the Online Services. In addition, when you elect to post information on message

boards, chat, profile pages and blogs and other services to which you are able to post information and materials (including, without limitation, our Social Media Pages) any such information you post or disclose through these services will become public and may be available to other users and the general public. We urge you to be very careful when deciding to disclose any information on the Online Services.

**Corporate Reorganization:**

We may disclose your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

**We may also use and disclose Personal Information, as we believe to be necessary or appropriate:**

- (a) under applicable law, including laws outside your country of residence;
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions;
- (e) to protect our operations or those of any of our affiliates;
- (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

**Protection of “Guest’s” Personal Information – Data Protection**

We seek to use reasonable organizational, technical and administrative measures to protect our “Guest” Personal Information data within our organization. We endeavor to protect the privacy of your account and other Personal Information that we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information. Also, while we endeavor to put adequate contractual protections in place we cannot guarantee the security of any Personal Information in databases hosted by third parties. When you log-in to complete or modify a Booking Profile, Guest Service Profile, your online interaction with us is protected from eavesdropping using the highest level encryption technology based on the browser you use. In order to ensure your privacy and the protection of information you choose to share with us, we allow only encrypted communications from all of our web forms.

It is important to note that any e-mail communication is not secure. This is a risk inherent in the use of e-mail. Please be aware of this when requesting information or sending forms to us by e-mail (for example, from the “Contact Us” section of our web site). We recommend that you do not include any confidential information (i.e. credit card information) when using e-mail. For your protection, our e-mail responses to you will not include any confidential information.

**Finally, to be prudent, please be sure to always close your browsers when you are done using a form or the reservation site. Although the session will terminate after a short period of inactivity, it is best to close your browsers immediately upon completion.**

## **Rights of the data subject**

Under certain circumstances, you have rights under data protection laws in relation to your personal data as follows:

**to request access to your personal data (commonly known as a “data subject access request”).:**

This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;

**to request correction of the personal data that we hold about you.**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us;

**to request erasure of your personal data:**

This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. It also enables you to request that we delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;

**to object to processing of your personal data where we are relying on a legitimate interest (or those of a third party)**

and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;

**to request restriction of processing your personal data:**

This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy;(b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;

**to request transfer of your personal data to you or to a third party:**

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you;

**to withdraw consent at any time where we are relying on consent to process your personal data:**

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us by using the contact details set out below under “CONTACT US” or by emailing

You will not have to pay a fee to access your personal data (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. If you wish to exercise any of those rights, we may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

### **Retention:**

Unless specifically requested, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, national identification number, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase, reservation, or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed. In addition, there may be certain information to which we are unable to enable you to review, for legal, security, or other reasons.

We will retain your Personal Information for the period necessary to fulfil the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

### **Protection of Minors**

Children and adolescents with limited legal capacity are as a matter of principle not allowed to transfer any personal data to our website without prior consent of their parents or legal guardian. Savoy will in no way knowingly collect personal data from children or adolescents with limited legal capacity, use these data in any form, or divulge these data to third parties without authorisation.

We do not knowingly collect, maintain or use Personal Information from individuals under 16 years of age in connection with. Additionally, we statement that no part of our Websites, Social Media Pages, and Apps is directed to individuals under the age of 16. If we do incidentally collect or maintain Personal Information from individuals under 16 years of age, you may request deletion of such information by contacting us as set forth under “Contact Us” below

### **Transferring your Personal Information outside UE**

We do not intend to transfer any personal data we hold about you to a country outside the European Economic Area (“EEA”).

If however we do transfer your personal data out of the EEA, we shall ensure a similar degree of

protection is afforded to it by ensuring at least one of the following safeguards applies:

- the countries to which it is transferred have been deemed to provide an adequate level of protection for personal data by the relevant regulators;
- we have put in place with the transferee specific contracts approved by the relevant regulators which give personal data similar protection to that it has in Europe; or
- if the transferee is in the US, it is registered with the Privacy Shield (or any similar replacement scheme) which requires it to provide similar protection to personal data as is required in Europe.

## **Changes to this Policy**

If we decide to make significant changes to our Privacy Policy, we will post the revised policy on our website ([www.savoy.it](http://www.savoy.it)) so you are always aware of how we treat Personal Information. Any other minor changes that may be made will be published in a privacy policy review document. Without your express consent we will not reduce your rights under this Privacy Policy with respect to Personal Information already collected about you. The changes related to the use of personal information are not retroactive for the Personal Data of which you have provided the explicit consent and that have been acquired before the change to the Privacy Policy, except where required by law. If we decide, at any time, to use your Personal Information in a different manner from what is stated in this Privacy Policy, you will receive this communication by letter or by e-mail at the most current address in our possession. In the event that you do not agree with the new way in which we intend to use your personal information, you can ask us via the contacting us section not to use your personal data in this way. If you do not send us any communication, your consent to the new use of your Personal information will be considered implicit.

## **Contacting us**

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below:

By Post

HOTEL SAVOY  
S.I.S.A. srl  
Via Ludovisi, 15 Roma 00187  
Tel +39 06421.551  
Fax +39 0642155.555

By MAIL

[privacy@savoy.it](mailto:privacy@savoy.it)

**Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.**

## COMPLAINTS

If you are not satisfied with our response to any queries or complaints you raise with us or believe we are not processing your personal data in accordance with the Data Protection laws you have the right to lodge a complaint at the Italian Data Protection Authority – Garante per la protezione dei dati personali (<http://www.garanteprivacy.it/>).

We would, however, appreciate the chance to deal with your concerns before you approach the DPA so please contact us in the first instance.

### The Actors

Il Garante per la Protezione dei Dati Personali – Data Protection Authority

Piazza di Monte Citorio, 121 – 00186 Roma

Tel: +39-06-6967 71

Fax: +39-06-6967 73785

E-Mail: [garante@gpdp.it](mailto:garante@gpdp.it)

PEC: protocollo@pec.it

Titolare del Trattamento – Data Controller

SI.SA srl

Via Ludovisi 15

00187 Roma

Tel: +39 06421551

Fax: +39 0642155555

E-Mail: [accounts@savoy.it](mailto:accounts@savoy.it)

Responsabile del Trattamento – Data Processor

Sandro Simbula

Hotel Manager

Tel. +3906421551

E-Mail: [manager@savoy.it](mailto:manager@savoy.it)

Responsabile della Protezione dei Dati – Data Protection Officer

VR Solutions srl

Via Giuseppe Gallignani 47

00124 Roma

Tel: +39 3409250697

E-Mail: [info@vrsolutions.it](mailto:info@vrsolutions.it)

PEC: vr@pec.vrsolutions.it

### Law References, rules, guidelines and legislation

This document is produced in line with the :

General Data Protection Document – GDPR

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of

personal data and on the free movement of such data.

The regulation is an essential step to strengthen citizens' fundamental rights in the digital age and facilitate business by simplifying rules for companies in the digital single market. A single law will also do away with the current fragmentation and costly administrative burdens.

#### The Data Protection Law Enforcement Directive

Directive (EU) 2016/680 on the protection of natural persons regarding processing of personal data connected with criminal offences or the execution of criminal penalties, and on the free movement of such data.

The directive protects citizens' fundamental right to data protection whenever personal data is used by criminal law enforcement authorities. It will in particular ensure that the personal data of victims, witnesses, and suspects of crime are duly protected and will facilitate cross-border cooperation in the fight against crime and terrorism

#### Consolidated Law on Public Security

Article 109 of the TULPS – Consolidated act on public security, establishes that the managers of Lodging-Related establishments like hotels and other accommodation facilities, with the exception of alpine shelters included in a special list, are obligated to communicate to the public security authority every day the person-lodge's check in registration card

#### National Data Protection Authority

Italian Data Protection Authority: EU countries have set up national bodies responsible for protecting personal data in accordance with Article 8(3) of the Charter of Fundamental Rights of the EU.

#### European Data Protection Board

The EU's national supervisory authorities are currently working together in the framework of the Article 29 Working Party. The European Data Protection Supervisor (EDPS) and the Commission are also members. As of 25 May 2018, the Article 29 Working Party will be replaced by the European Data Protection Board (EDPB). The EDPB has the status of an EU body with legal personality and is provided with an independent secretariat.

The EDPB has extensive powers to determine disputes between national supervisory authorities, to give advice and guidance on key concepts of the GDPR and Police Directive.

## **Privacy Policy pursuant to Article 13 of (EU) Regulation No. 679/2016 (“GDPR”)**

Hotel Savoy – S.I.S.A. srl protects the confidentiality of personal data and guarantees its necessary protection against any event that may put it at risk of violation. As provided for by European Union Regulation No. 679/2016 (hereinafter “GDPR”) and Article 13 in particular, please find below the information required by law relating to the processing of your personal data.

### **1.- Who we are and what data we process (Article 13, paragraph 1 (a), Article 15 (b) GDPR)**

Hotel Savoy – S.I.S.A. srl, represented pro tempore with registered offices at Via Ludovisi, 15 Roma Italy, acts as the Data Controller and can be reached at [privacy@staff.aruba.it](mailto:privacy@staff.aruba.it) and collects and/or receives information relating to you, such as:

#### **Contact details**

First name, last name, physical address, nationality, residential province and city, landline telephone number and/or cell number, fax, tax ID number, email address(es)

#### **Banking information**

IBAN and banking/postal account information (except for Credit Card number)

#### **Internet traffic data**

Logs, originating IP address

Hotel Savoy – S.I.S.A. srl does not require you to supply so-called “private” data, that is, according to the provisions of the GDPR (Art. 9), personal data that identifies race or ethnicity, political opinions, religion or philosophy, or any union affiliation, nor any genetic or biometric information used to uniquely identify a physical person, data associated with health or one’s sex life, or sexual orientation. In the event the services requested from Hotel Savoy – S.I.S.A. srl require the processing of this data, you will first receive specific notification with a request for your consent.

### **2.- Why we need your data (Art. 13, paragraph 1 GDPR)**

The data is used by the Data Controller to fulfil the registration request and for the supply contract on the preselected Service and/or Product purchase, to manage and execute the contact requests forwarded by you, offer assistance, fulfil legal and regulatory obligations demanded of the Data Controller in accordance with the activities performed. In no case will Hotel Savoy resell any of your personal information to third parties nor use it for any purpose not stated.

In particular, your data will be processed for:

#### **a – registration and contact information, and/or informational materials**

Your personal data is processed to implement preliminary actions and those following a registration

request, to manage information and contact requests, and/or to send informational materials, the hotel service surveys (not obliged to compile), as well as to satisfy any and all other obligations arising herewith.

The legal basis for this processing is to provide the services relating to a request for registration, information and contact, and/or the sending of informational materials, and to comply with legal requirements.

#### **b – administering the contractual relationship**

Your personal data is processed to implement preliminary actions and those following the acquisition of a Service and/or a Product, handling of any complain and/or notifications to the support service and performance of the support itself, fraud prevention, as well as fulfilment of any and all other requirements arising from the contract.

The legal basis for this processing is to provide the services relating to the contractual relationship and to comply with legal requirements.

#### **c – promotional activities on Services/Products that are similar to those you have got (Clause 47 GDPR)**

The Data Controller, even without your explicit consent, may use the contact information you provided for direct sales of its own Services/Products, limited to those Services/Products that are similar to the ones included in the sale, unless you specifically refuse ([privacy@savoy.it](mailto:privacy@savoy.it)).

#### **d –business promotional activities on Services/Products that are different from the ones you purchased**

Your personal data may also be processed for business promotional purposes, for market research studies involving the Services/Products that the Data Controller offers, but only if you have authorized this processing and have not opposed it.

#### **This processing may occur by the following automated methods:**

- e-mail;
- sms;
- telephone contact

#### **and may occur:**

- a) if you have not withdrawn your consent for the use of your data;
- b) if processing is done through contact with a telephone operator, and you are not registered on the not to call registry as outlined in Presidential Decree No. 178/2010;

The legal basis for this processing is the consent you initially granted for the processing itself, which you may freely withdraw at any time.

#### **e – digital security**

The Data Controller, in line with the provisions of Clause 49 of the GDPR and through its providers

(third parties and/or recipients), processes your personal data involving traffic only to the extent strictly necessary and proportional to guarantee security of the networks and the information. This means the capacity of a network or information system to block, at a given level of security, any unforeseen events or illegal or malicious acts that would compromise the availability, authenticity, integrity and confidentiality of the personal data stored or transmitted. The Data Controller will immediately notify you if there is any risk of violation of your data, except for any obligations noted in the provisions of Art. 33 GDPR associated with notifications of personal data violations.

The legal basis for this processing is to comply with legal requirements and the legitimate interests of the Data Controller in undertaking processing for the purpose of protecting corporate assets and the security of the Hotel Savoy's offices and systems.

#### **f – profiling**

Your personal data may also be processed for profiling purposes (such as analysing the transmitted data and the pre-selected Services/Products, suggesting advertising messages and/or business offers in line with user selections) exclusively when you have given explicit and informed consent.

The legal basis for this processing is the consent you initially granted for the processing itself, which you may freely withdraw at any time.

#### **g – fraud prevention (Clause 47 and Art. 22 GDPR)**

Your personal data, except for private data (Art. 9 GDPR) or legal information (Art. 10 GDPR) will be processed to allow controls for monitoring purposes and prevention of fraudulent payments. This processing will be done by software systems that run automated checks and will be carried out prior to negotiating Services/Products;

a negative result on these checks will render the transaction impossible; you can, in any case, express your opinion, obtain an explanation or dispute the decision by outlining your reasons to the Customer Support Department or to the contact [privacy@savoy.it](mailto:privacy@savoy.it);

personal data collected only for anti-fraud purposes, which differs from the data needed for the proper performance of the service requested, shall be immediately deleted upon termination of the verification phase.

#### **h – protection of minors**

The Services/Products offered by the Controller are reserved for those entities legally able, based on national regulations, to satisfy contractual obligations. The Controller, to prevent illegal access to its own services, implements preventive measures to protect its own interests, such as checking tax identification numbers or, when necessary for specific Services/Products, the accuracy of the identification data on the identification documents issued by the applicable authorities.

### **3.- Communication to third parties and categories of recipients (Article 13, paragraph 1 GDPR)**

Your personal data is communicated mainly to third parties and/or recipients whose activity is necessary to perform the activities relating to the contract established, and to meet certain legal requirements, such as:

#### **Company employees**

Fulfilment of administrative and accounting requirements as well as those connected with the contractual services

#### **Third party providers**

Performance of services (assistance, maintenance, delivery/shipping of products, performance of additional services, providers of networks and electronic communication services) associated with the requested service

#### **External professionals/consultants and consulting firms**

Fulfilment of legal requirements, exercising rights, protecting contractual rights, credit recovery

#### **Financial Administration, Public Agencies, Legal Authorities, Supervisory and Oversight Authorities**

Fulfilment of legal requirements, protection of rights; lists and registries held by Public Authorities or similar agencies based on specific regulations relating to the contractual service

#### **Formally mandated subjects or those with recognized legal rights**

Legal representatives, administrators, guardians, etc.

*\* The Controller requires its own third-party providers and Data Processors to adhere to security measures that are equal to those adopted for you by restricting the Data Processor's scope of action to processing directly related to the requested service.*

*The Controller will not transfer your personal data to countries where the GDPR is not applicable (countries outside the EU) except where specifically indicated otherwise, in which case you will be notified first, and if necessary asked for your consent.*

*The legal basis for this processing is fulfilment of the services outlined in the established contract, compliance with legal obligations, and the legitimate interests of Hotel Savoy – S.I.S.A. srl. to perform the processing necessary for these purposes.*

#### **4.- What happens when you do not provide your identification information as needed to perform the requested service? (Article 13, paragraph 2 (e) GDPR)**

The collection and processing of your personal data is necessary to fulfil the wi-fi service requests as well as to perform the Service. Should you fail to provide your personal data as expressly required within the order form or the registration form, the Data Controller will not be able to carry out the processing associated with managing the requested services and/or the contract and the Services/Products associated with them, nor fulfil the operations dependent on them.

#### **5.- What happens when you do not provide the consent for processing personal data for the business promotion activities on Services/Products that are different from those purchased?**

When you do not give your consent to the processing of your personal data for these purposes, the processing will not be implemented for these specific purposes, but it will not affect the performance of the requested services or those for which you have already given your consent, if requested. In the event you have given consent and later withdraw it or oppose the processing for business promotional activities, your data will no longer be processed for these activities, although this will not create negative effects or consequences for you or the services requested.

#### **6.- How we process your data (Article 32, GDPR)**

The Controller makes use of appropriate security measures to preserve the confidentiality, integrity and availability of your personal data, and requires the same security measures from third party providers and the Processors

#### **7.- How long is your data stored? (Article 13, paragraph 2 (a) GDPR)**

Unless you explicitly express your own desire to remove it, your personal data will be stored until required for the due purposes for which it was collected. In particular, the data will be stored for the entire duration of your registration and in any case for no longer than a maximum period of 12 (twelve) months of inactivity, that is, within this time period, there have been no Services and/or Products purchased using this registration.

For data provided to the Controller for the purposes of business promotion for services other than those you have already purchased, for which you initially gave consent, it will be stored for 24 months, except when such consent is withdrawn ([privacy@savoy.it](mailto:privacy@savoy.it)).

For data provided to the Controller for the purposes of profiling, it will be stored for 12 months, again except when consent has been withdrawn. It is also important to add that, should the user forward to Hotel Savoy – S.I.S.A. srl personal data that has not been requested or that is unnecessary for the purposes of performing the services requested, or for the performance of services strictly connected thereto, Hotel Savoy – S.I.S.A. srl cannot be considered controller of this data and will proceed to delete it as soon as possible.

For data provided from our SMP loyalty program, prenoting on [www.savoy.it](http://www.savoy.it) you will automatically be part of SMP, it will be stored for 60 months from the last purchased service, except when such consent is withdrawn ([privacy@savoy.it](mailto:privacy@savoy.it)).

Regardless of your determination to remove the data, your personal information will be, in any case, stored according to the terms outlined in current law and/or national regulations, for the exclusive purpose of guaranteeing specific requirements, applicable to certain Services (for example, but not limited to, WI-FI Service). Furthermore, personal data will in any case be stored to comply with obligations (e.g. tax and accounting purposes) which may continue even after termination of the contract (Art. 2220 Civil Code); for these purposes, the Controller shall retain only the data necessary to complete these activities. For those cases where the rights arising from the contract and/or registration are used in the courts, your personal data, exclusively required for these purposes, shall be processed for the time necessary to complete them.

## **8.- What are your rights? (Articles 15 – 20 GDPR)**

You have the right to obtain the following from the Data Controller:

a)

confirmation on whether your personal data is being processed and if so, to obtain access to your personal data and the following information:

- the purposes of the processing;
- the categories of personal data in question;
- the recipients or categories of recipients that have received or will receive your personal data, in particular if these recipients are in third party countries or are international organizations;
- when possible, the anticipated storage period of your personal data or, if not possible, the criteria used to determine this period;
- whether you have the right to ask the Data Controller to correct or delete your personal data or the limits on processing your personal data or to oppose the processing of the data;
- the right to lodge a complaint with a supervisory authority;
- in the event the data is not collected from you, all of the information available regarding its origin;
- whether there is an automated decision process, including profiling, and, at least in these cases, significant information on the logic used, as well as the importance and consequences to you for this processing.
- the suitable guarantees provided by the third-party country (outside EU) or international organization to protect any transferred data;

b)

the right to obtain a copy of the personal data processed, again given that this right does not affect the rights and freedoms of others; for extra copies requested by you, the Data Controller may assign a reasonable fee based on administrative costs.

c)

the right to edit any of your incorrect personal data from the Data Controller without unjustified delay

d) the right to have your personal data deleted by the Data Controller without unjustified delay, if there are the reasons outlined in the GDPR, Article 17, including, for example, if the data is no longer needed for processing or if the data is considered illegal, and again, if there are no conditions outlined by law; and in any case, if the processing is not justified by another equally legitimate reason;

d)

the right to obtain limits on the processing from the Data Controller, in those cases outlined in Art. 18 of the GDPR, for example where you have disputed the correctness, for the period necessary for the Data Controller to verify the data's accuracy. You must be notified, within an appropriate time, even when the suspension period has passed or the cause of limiting the processing has been eliminated, and therefore the limitation itself has been withdrawn;

e)

the right to obtain information from the Data Controller on the recipients who have received the requests for any corrections or deletions or limits on the processing implemented, except when this is impossible or would create a disproportionate effort.

f)

the right to receive your personal data in a structured format, commonly used and readable by automatic devices as well as the right to forward this data to another Data Controller without obstruction from the original Data Controller, in those cases outlined by Art. 20 of the GDPR, and the right to obtain direct forwarding of your personal data from one Data Controller to another, if technically feasible. For further information and to send your request, contact the Data Controller at [privacy@savoy.it](mailto:privacy@savoy.it). To guarantee that the rights noted above are exercised by you and not by unauthorized third parties, the Data Controller may require you to provide other information necessary for this purpose.

For further information and to send your request, contact the Data Controller at [privacy@savoy.it](mailto:privacy@savoy.it). To guarantee that the rights noted above are exercised by you and not by unauthorized third parties, the Data Controller may require you to provide other information necessary for this purpose.

## **9.- How and when can you oppose the processing of your personal data? (Art. 21 GDPR)**

For reasons associated with your particular situation, you may at any time oppose the processing of your own personal data if it is based on legitimate reasons or if it is done for business promotional activities, by sending a request to the Data Controller at [privacy@savoy.it](mailto:privacy@savoy.it). You have the right to have your own personal data deleted if the Data Controller has no legitimate reason prevailing over such request, and in any case, where you have opposed the processing for business promotional activities.

## **Who can you lodge a complaint with? (Art. 15 GDPR)**

Without prejudice to any other ongoing administrative or judicial action, you may lodge a complaint with the applicable supervisory authority of the Italian territory (Italian Personal Data Protection Authority), that is, with the agency that performs its duties and exercises its rights within the member country where the GDPR violation occurred.

Any updates to this information shall be communicated in a timely manner and through suitable means and will be notified to you if the Data Controller processes your data for purposes other than those outlined in this privacy policy prior to proceeding and after you have given your consent, if necessary.

**The Data Controller has nominated a Data Protection Officer (DPO) who can be contacted for any information or requests at [privacy@savoy.it](mailto:privacy@savoy.it)**

## **Third Party Data Processing**

This section gives you specific information on the processing of your personal data for each of the Third Part Services outlined below

### **What data we process (Article 13, paragraph 1 (a), Article 15 (b) GDPR)**

#### **Contact details**

First name, last name, email address(es)

#### **Internet traffic data**

Logs, originating IP address

### **How long is your data stored? (Article 13, paragraph 2 (a) GDPR)**

In regard to the provisions of the applicable laws, the personal data outlined below shall be stored for the period indicated:

#### **Contact details**

in accordance with the provisions outlined in Section 8 – Hotel Savoy – S.I.S.A. SRL Privacy Policy

#### **Internet traffic data**

in accordance with the provisions outlined in Section 8 – Hotel Savoy – S.I.S.A. SRL Privacy Policy

## **Blastness**

In compliance with Article 4 of GDPR 679/2016, the Data Controller and System Administrator for the [www.savoy.it](http://www.savoy.it) website and the [www.blastnessbooking.com](http://www.blastnessbooking.com) online booking platform integrated in the site is BLASTNESS S.r.l. with registered offices at 27 Piazza J.F. Kennedy, 19125, La Spezia (SP), Tel. 0187 599737- Fax 0187 020349 – email: [info@blastness.com](mailto:info@blastness.com). For more information, consult the Blastness section: <http://www.blastness.com/#about>

## **Review Pro**

“Review Pro” manages guest feedback more easily and efficiently thanks to the fully-integrated platform which combines online reputation and guest surveys in one tool.

### **Key Feature:**

#### **Flexibility & ease of use**

Quickly create and send customized surveys in up to 36 languages. We offer the flexibility to have a core survey and create question modules based on specific hotels, segments or guest types.

#### **Advanced question logic**

Display or hide questions based upon guest responses, making the survey more relevant to each guest and giving you more detailed feedback to help prioritize operational, service or product related improvements.

#### **In-stay surveys**

Send short surveys while guests are still on property to identify the need for service recovery. Take corrective action before guests check out to help improve satisfaction and reduce negative online reviews.

#### **Sentiment analysis**

Identify positive and negative comments related to guests’ experiences in more than 26 categories to help prioritize operational/service improvements.

For more information, consult the Review Pro sections:

‘Terms and Condition’ section <https://www.reviewpro.com/terms-conditions/>

Sezione 'Privacy Policy' <https://www.reviewpro.com/it/privacy-policy>

## **Savoy Membership Program**

### **How to be a SMP Member**

Our loyalty program is proposed to whom books directly with us using our selling channel on [www.savoy.it](http://www.savoy.it) and consists in additional services offered by the hotel due to the automatic generation of a loyalty SMP managed account.

You can disclose from the loyalty program by sending us a mail at [accounts@savoy.it](mailto:accounts@savoy.it) with the cancellation request.



## PRIVACY DISCLAIMER

### INFORMATION ON THE PROCESSING OF PERSONAL DATA FOR ACTIVITIES CONCERNING THE CONTRAST TO THE DISSEMINATION OF THE VIRUS COVID-19

This privacy notice is to explain and provide you with information on how we collect and hold data about you. This is in relation to the unprecedented challenges we face because of the Coronavirus pandemic (COVID-19).

Few countries have frameworks in place to support these extraordinary measures in ways that are fast, secure, trustworthy, scalable and in compliance with existing privacy and data protection regulations. As a result, many countries recently have passed or are about to pass laws specifying how data collection will be restricted to a certain population, for what time, and for what purpose. For instance, the Italian government published a Decree to create a special legal framework for collecting and sharing personal data related to health by public health authorities and by private companies that are part of the national health system for the duration of the state of emergency.

You can view the general Privacy Statement of the Savoy Hotel – S.I.S.A. srl which has more about how we collect, use and protect personal data generally, as well as your rights as a data subject

Pursuant to article 13 of Regulation (EU) 2016/679, we inform you that the personal data acquired are processed, even automatically, for all activities relating to the fight against the spread of the Covid - 19 virus in the workplace and especially in the Hotel Savoy.

## DATA CONTROLLER

The Data Controller is S.I.S.A. srl - Hotel Savoy, with registered office in Via Ludovisi 15 00197 Rome, responsible for the legitimate and correct use of your personal data and who you can contact for any information or request at the following addresses.

Contacts: 0039 06 421551

certified e-mail address: [hotelsavoy@pec.net](mailto:hotelsavoy@pec.net)

email box: [manager@savoy.it](mailto:manager@savoy.it)

VR Solutions srl is the DPO in charge responsible for the protection of personal data and can be contacted at the following mail address [info@vrsolutions.it](mailto:info@vrsolutions.it), certified mail address [vr@pec.vrsolutions.it](mailto:vr@pec.vrsolutions.it) or by TEL +393409250697 to get information and submit requests about your data or to report disservices or any problems encountered.

## INTERESTED PARTIES IN THE TREATMENT

Employees, collaborators, visitors, people who have access to company premises including the hotel's guests.

## WHY WE USE OR PROCESS YOUR DATA

To best respond and help coordinate the community response for COVID-19 it is necessary to collect data about you.

## WHAT INFORMATION WE NEED AND HOW WE USE IT

Whilst we may already hold data about you, you may have provided this information for a specific reason and normally we would seek to inform you that the data provided would be used for a different reason. Due to the rapidly emerging situation regarding the current pandemic, this will not always be possible. This might include using the contact information we have to send you public health messages, either by phone, text or email.

Additionally, at this time we may ask you for more information, where it is necessary to ensure your safety and well-being. We will, however, ensure that this is limited to what is proportionate and necessary to manage the spread of the virus and safeguard those most vulnerable. The use of this information is subject to national guidance issued by the Department for Health and Social Care and the Local Government.

Data processed:

- health state
- current pathologies

Legal basis of

reference:

- reasons of public interest: implementation of the anti-contagion safety protocols pursuant to art. 1, no. 7, lett. d) of the Prime Ministerial Decree of 11 March 2020, in particular Shared Protocol of 14 March 2020, Protocol of 24 April 2020 and subsequent additions and amendments
- legal obligation: art. 32 Constitution; art. 2087 c.c. ; Legislative Decree 81/2008 (in particular art. 20)

## WHO WE WILL SHARE YOUR DATA WITH

Your data may be shared where we have identified a need to provide support, internally or externally, with local health organizations such as the NHS, Public Health Structures and Public authorities

Further information about how health and care data is being used and shared by other NHS and social care organizations in a variety of ways to support the Covid-19 response is below.

## WHAT THE LAWFUL BASIS IS FOR PROCESSING PERSONAL DATA

The Hotel Savoy – S.I.S.A. srl have received information from the Ministry Of Health, Communities and Local Government and the Department of Health and Social Care. We have instructions on how to use this information in the current circumstances. Additionally, we receive information containing personal and special category data from the NHS and local support providers. The Government has issued advice on the sharing of data, they have also provided a link to frequently asked questions about the law based on the Shared Protocol of 14 March 2020, Protocol of 24 April 2020 and subsequent additions and amendments.

The Information Commissioners Office and the National Data Guardian have released statements on the use of Health and Social Care data at this time.

### **About Personal Data**

The General Data Protection Regulation requires specific conditions to be met to ensure that the processing of personal data is lawful.

The conditions that are relevant are:

Article 6(1) (c) GDPR - processing is necessary for compliance with a legal obligation to which the controller is subject

Article 6(1) (d) GDPR - processing is necessary in order to protect the vital interests of the data subject or another natural person

Article 6(1) (e) GDPR - 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 controller

### **About Special Category Data**

In relation to the processing of personal data, specifically sensitive, genetic, biometric data, related to health (art.9 EU Regulation 2016/679), the processing concerns, among others, the following types of data:

Health status - current diseases (Health data)

The processing of personal data belonging to these particular categories is possible because it is based on the following conditions:

- It is necessary for reasons of public interest relevant on the basis of Union or Member State law, which must be proportionate to the aim pursued, respect the essence of the right to data protection and provide for appropriate and specific measures to protect fundamental rights and the interests of the data subject
- It is necessary for purposes of preventive medicine or occupational medicine, assessment of the employee's working capacity, diagnosis, health or social assistance or therapy or management of health or social systems and services on the basis of Union or Member State law, or in accordance with the contract with a healthcare professional
- It is necessary for reasons of public interest in the field of public health, such as protection from serious cross-border threats to health or the guarantee of high quality and safety parameters of health care and

medicines and medical devices, based on Union or Member State law which provides for appropriate and specific measures to protect the rights and freedoms of the data subject, in particular professional secrecy

The processing of special categories of personal data, which includes data concerning a person's health, are prohibited unless specific further conditions can be met, as follows:

Article 9 (2) (b) GDPR - processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law

Data Protection Act 111/2018, - employment, social security and social protection

Article 9 (2) (c) GDPR - processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent

Article 9 (2) (g) GDPR - processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued

Data Protection Act 111/2018, - statutory and government purposes

Data Protection Act 111/2018, - safeguarding of children and of individuals at risk

Article 9 (2) (h) GDPR - processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health and social care treatment or the management of health and social care systems and services

Data Protection Act 111/ 2018, Schedule 1 - health and social care purposes

Article 9(2) (i) GDPR - processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health

Data Protection Act 111/2018, Schedule 1 - processing is necessary for reasons of public interest in the area of public health

The regional and national legislation, policies and guidance that relate to this service include, but are not limited to allows the local authorities continue to exercise its functions in the event of an emergency, give powers to local authorities to promote economic, social and environmental well-being and the legal framework for local authorities support an individual's 'wellbeing'

## HOW WE STORE YOUR INFORMATION

We will only keep your information for as long as it necessary. We will consider Government guidance and the on-going risk presented by Coronavirus and the requirements of public accountability for our response to this emergency.

As a minimum the information outlined in this privacy notice will be kept for the duration of the COVID-19 response. However, in most cases, data will be kept for longer to meet evidential requirements under Italian statute and common law.

If possible, we will anonymise your personal data so that you cannot be identified. This cannot be done where data is needed to provide direct services to individuals.

When the information is no longer needed for this purpose it will be either deleted or anonymised for statistical purposes.

#### COLLECTED DATA

1. Body temperature detected in real time, without registration or storage, except for the cases referred to in the following n. 2;
2. Identification data and registration of exceeding the temperature measured only if it is necessary to document the reasons that prevented access to the company premises or their permanence; as well, in this case, the recording of data relating to temporary isolation, such as the exit time and the circumstances referred to by the interested party as justification for leaving the temporary isolation;
3. situations of danger of contagion from Covid-19, including data relating to the state of health, such as, for example, body temperature / flu symptoms; origin / non-origin from the areas at epidemiological risk; presence / absence of contacts in the last 14 days with subjects tested positive for COVID-19
4. data relating to the state of health regarding the "occurred negative" of the Covid-19 buffer result
5. situations of particular fragility and current or previous employee pathologies

#### RIGHTS

In addition to the above information, to ensure that your data is processed as correctly and transparently as possible, you must be aware of the fact that:

- has the right to ask the data controller to access your personal data, to correct or cancel them, limit the processing or to oppose their treatment;
- if you have given consent for one or more specific purposes, you have the right to withdraw this consent at any time;
- has the right to lodge a complaint with the following Supervisory Authority: Guarantor for the protection of personal data;

#### CONSEQUENCES IN CASE OF REFUSAL TO COLLECT OR SUPPLY DATA

In the case of refusal of temperature detection or data supply, access to the premises and their permanence are prohibited