

Information on privacy

We at HOTEL ATLANTE GARDEN intend to safeguard our guests. This document describes which information we collect of our guests, visitors, members and corporate contacts. This privacy act is in accordance with art. GDPR 679/2016 EU Privacy Regulation d.lgs. 196/2003.

Accepting the current privacy act you agree for the collect of personal data to be utilized as follows:

1) Which client data is collected?

We may collect guest's personal data through filling of forms, information uploaded to our website, participation in surveys, contacting us personally or professionally with different methods of communication. Said data could be: name and address, e-mail address and contents, invoicing address, personal preferences regarding accommodation (on the basis of reservations made), phone numbers and other similar content. The client is not obliged to submit such information, however if the decision is not to supply the information, it may not be possible to provide an adequate service.

Should an event be organized, the details of such shall be registered and in that circumstance information of guests could be collected. Promotional information could be sent to said guests.

Information for minors under 16 years of age: In this case parents or tutors shall authorize the collect of data such as name, age, sex, language spoken, in order to assure the identity of all our guests.

Information from third parties: We may receive data from agencies, from our research provider or other service operators.

2) Use of guest data:

All guest data within our company shall be handled according to current laws where necessary, for replying to questions and complaints, providing personal services of a superior quality. Furthermore we may publish content on our website such as stories, photos, observations and reviews when provided by the user; manage employment candidacies sent to us, allow access to suppliers and providers of services for the completion of certain functions on our behalf; sending commercial communications, newsletters, personal notifications to users with their consent as per current laws; manage our activity, including financial operations, credit control and debit collection; guarantee the safety of rooms and properties, for example with the installation of closed circuit video surveillance; data analyzation, statistical research, demographic data and guests profiles in order to develop services and guarantee efficient company operations; comply with the applicable laws, for example by requests of the courts or regulatory agencies, where there is a lawful request.

3) Purpose of data provision

We may handle client data in order to manage client relations (reservations, invoicing, quotations), to fulfil eventual contractual obligations, manage litigation and fulfillment of regulatory obligations, administrative or financial. Furthermore, to provide the expected and requested services the data may be utilized in the following ways:

- Send **with your written consent** promotional offers regarding our services, rate updates, offers, communication via ordinary post, fax or e-mail.
- Dispatch **with your written consent** data regarding your stay to external hotel service providers to allow the receipt of deliveries, messages and phone calls.
- Manage **with your written consent** sensitive data voluntarily provided to assure a higher quality of hospitality.
- We may utilize your e-mail address **with your written consent** to send our newsletter.

Said data necessary for completion of the above purposes is obligatory, their nonacceptance may lead to the impossibility to obtain the services requested. Data submitted with your written consent is not obligatory and do not prevent the fulfilment of the service.

4) Disclosure of guest information

For the above purposes, data could be disclosed to a third party in accordance to the law, including: hotels, resorts and offices associated and/or managed by us where necessary for reservations or related requests: to the public, if the guests requests or discloses information spontaneously; to travel agencies utilized for reservations or information requests; to the payer, for example employers which settle bills on behalf of the guest; to contractors in the field of residential construction, prior to guest's

consent: to juridical personnel, in joint venture functions, collaborations, juridical changes or similar circumstances; public authorities, where there should be a lawful request; to any other party, with prior consent of the user.

5) Identity of the data controller and place of processing

The data supplied is managed by GHETTAL S.r.l. in quality of data controller, with its registered office based in Rome, Viale Bruno Buozzi n.102, VAT No. 08395941001. The data collector guarantees safety, confidentiality and protection of the information in their possession, in all phases of the process. Such data is collected in their registered office.

The collection and processing of data is performed according to current laws in matters of Privacy (GDPR 679/2016, d.lgs. 196/2003).

6) Period of conservation

The data is strictly managed for the necessary time to carry out the requested service by the guest or however long to reach the intent of current document. In any case, such data will be kept for a maximum of 5 years (five).

The guest has the specific rights as described:

- **Right to request a copy** of their personal data.
- **Right to correction**: it is possible to request the change of data supplied in an imprecise or incomplete manner.
- **Right to withdrawal consent**: the guests may withdraw the authorization of data processing executed by us on the basis of their prior consent. Such withdrawal will not affect the legitimacy of processing based on the prior consent. A guest who decides to withdraw may not benefit the use of certain services for which processing is indispensable.
- **Right to oppose**: the current request shall be respected unless there is a prevailing legal purpose or other legal reason which justifies the continuation of processing. Where the handling of data is dealt by automatized processes, the client may oppose the decision and request a non-autonomous intervention.
- **Right to request a restriction**: The request of a restriction shall be respected where there is a legal reason not to do so.
- **Right to cancellation**: The guest may request a cancellation of their personal data, HOTEL ATLANTE STAR will proceed unless there is a lawful impediment.
- **Right of data portability**: in certain circumstances the guest may request that the holder of processing transfer a copy of the data to a third party or similar. Such transfer does not imply to the cancellation of data.
- **Right to report to a supervisory authority**: We suggest guest to contact us with regards to questions or complaints related to the processing of their personal data managed by us. However, the concerned party may contact the European supervisory authority at the following link:
http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

In the case of questions and request it is possible to write to us at HOTEL ATLANTE GARDEN Via Crescenzo n. 78 – 00193, Rome, or also at our e-mail address info@atlantehotels.com or contact us telephonically at +39 06 6872361