



Subject: Information for customers on the processing of personal data (pursuant to Legislative Decree No. 196/2003, Legislative Decree 101/2018 and Article 13 of the GDPR regarding Privacy No. 679/2016)

Introduction

With this disclosure, Savonera S.r.l., with headquarters in Via dei Mille, 1 – 20811 Cesano Maderno (MB), as Data Controller, intends to comply with the provisions of the "Privacy Code" Legislative Decree no. 196/2003 - as amended by Legislative Decree no. 101/2018 - and in the EU Regulation no. 679/2016.

For personal data, for processing and for all the other nomenclatures indicated in this information, reference must be made to the definitions set out in Article 4 of the EU Regulation.

1. Subject

Savonera S.r.l., as Data Controller, informs the customer that it is required to process personal data concerning him or her to complete registration at the facility.

The data that will be collected are your personal data (which include the data necessary for booking the room), data relating to personal preferences and billing data.

2. Purpose of the processing

The data of the data subject, in this case personal data, are collected for the following purposes:

- 2.1.*** Customer management.
- 2.2.*** Benefit from the service and/or fulfil contractual obligations deriving from existing relationships with you.
- 2.3.*** Exercise the rights of the Data Controller.
- 2.4.*** Legal compliance regarding taxation and accounting.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

3. Methods of data processing

Data processing is carried out with the aid of electronic tools or paper supports, in compliance with the security and data protection measures referred to in Legislative Decree no. 196/2003, of the European Regulation no. 679/2016 and Legislative Decree no. 101/2018.

The processing of personal data is carried out by the Data Controller and by the Data Processor designated by the company.

Data processing is carried out by Savonera S.r.l. in compliance with the principles of lawfulness, necessity and proportionality of the processing.



4. Data retention

The personal data processed for the purposes referred to in point 2 will be kept for the time strictly necessary to achieve those same purposes as well as up to the period of time envisaged and admitted by the Italian legislation for the protection of the interests and the right of defence of Savonera S.r.l., regarding the limitation periods established by the applicable legislation.

5. Recipients of the data

Your personal data may be shared with:

- 5.1.** subjects that typically act as Data Processors, namely: *i)* consultant and freelance professionals; *ii)* subjects delegated to technical maintenance; *iii)* banks and lenders; *iv)* Police headquarters (collectively "Recipients").
- 5.2.** subjects, bodies or authorities to whom it is mandatory to communicate your personal data in accordance with the provisions of law or orders of the authorities.
- 5.3.** persons authorized by the Data Controller to process personal data necessary to carry out activities strictly related to the provisions of services, who are committed to confidentiality or have an adequate legal obligation of confidentiality and who guarantee the processing of data in accordance with the GDPR.

The complete and updated list of Data Processors is kept at the operational headquarters of the Data Controller, located in Collegno (TO) and can be sent by sending a written request to the Data Controller at the addresses indicated in the "Contacts" section of this document

6. Legal basis and mandatory or optional nature of the processing

The legal basis for processing personal data for the purposes set out in sections **2.1.** and **2.2.** is art. 6(1)(b) of the GDPR (*[...] processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [...]*), as the processing are necessary for the performance of the activity related to the employment relationship. The provision of personal data for these purposes is optional, but failure to provide it would make it impossible to activate the requested services.

The legal basis for the purpose referred to in section **2.3.** is art. 6(1)(f) of the GDPR (*[...] processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject [...]*), in order to ascertain, exercise or defend a right in court. This processing is also necessary in the presence of the aforementioned requirements.



The legal basis for the purpose referred to in section **2.4.** is art. 6(1)(c) of the GDPR ([...] *processing is necessary for compliance with a legal obligation to which the controller is subject* [...]). In fact, once the personal data has been provided, the processing is necessary to comply with legal obligations to which Savonera S.r.l. is subject.

7. Rights of the data subject

The article from 15 to 22 of the GDPR lend the data subject the exercise of specific rights, including that to obtain from the Data Controller confirmation of the existence or otherwise of their personal data and their making available in an intelligible form; the data subject has the right to know the origin of the data, the purpose and methods of the processing, the logic applied to the processing carried out with the aid of electronic instruments, the identification details of the Data Controller and the subjects to whom the data may be communicated; the data subject also has the right to obtain the updating, rectification and integration of data, erasure, transformation into anonymous form or blocking of data processed in violation of the law; the data subject has the right to object, in whole or in part, for legitimate reasons, to the processing of personal data concerning him or her, even if pertinent to the purpose of the collection and to the processing of personal data for the purpose of sending advertising or sales material direct or for carrying out market research or commercial communication through the use of automated call systems without the intervention of an operator by e-mail and/or through traditional marketing methods by telephone and/or paper mail.

Where applicable, you also have the rights pursuant to articles 16 – 22 of the GDPR (Right to rectification, right to be forgotten, right to restriction of processing, right to data portability, right to object, right to object to automated processing including profiling).

8. Data Controller and contacts

Data Controller is **Savonera S.r.l.**, with headquarters in Via dei Mille, 1 – 20811 Cesano Maderno (MB)

e-mail: info@diamantemhotel.it