

PRIVACY POLICY - APARTHOTEL DUOMO - AHD ROOMS

PURSUANT TO ARTICLES 13 AND 14 OF THE GENERAL DATA PROTECTION REGULATION (EU) 2016/679 AND DECREE-LAW 196/2003 AND SUBSEQUENT AMENDMENTS

The Data Controller

Following consultation of the site listed above, data relating to identified or identifiable natural persons may be processed.

The Data Controller is **FIVE TO SEVEN SRL** with registered office in Milan, Via Agnello 2 - 20121 Milano (MI), VAT Number 06329690967.

Legal basis of the processing

The legal basis of the processing is as follows:

the processing is necessary to fulfil a legal obligation to which the Controller is subject, pursuant to Article 6(1)(c) of EU Regulation 2016/679;

the processing is necessary for the pursuit of the legitimate interest of the Controller or third parties, pursuant to Article 6(1)(f) of EU Regulation 2016/679;

the processing is necessary to fulfil the pre-contractual relationship through the "Book now" page, pursuant to Article 6(1)(b) of EU Regulation 2016/679.

However, it is possible to request the Data Controller to clarify the concrete legal basis of each processing and, in particular, to specify whether the processing is based on the law or provided for by a contractual or pre-contractual relationship.

Types of data processed and purposes of processing

Browsing data

The computer systems and software procedures used to operate this site acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This category of data includes the IP addresses or domain names of the computers and terminals used by users, the URI/URL (Uniform Resource Identifier/Locator) notation addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relating to the user's operating system and IT environment.

These data, necessary for the use of web services, are also processed in order to:

- obtain statistical information on the use of the services (most visited pages, number of visitors per time slot or per day, geographical areas of origin, etc.)
- checking the correct functioning of the services offered.

Browsing data do not persist for more than seven days (except in the event of the need to ascertain crimes by the judicial authorities).

Data communicated by the user

The optional, explicit and voluntary sending of messages to the Controller's contact addresses, private messages sent by users to social media profiles/pages (where this option is available), as well as the completion and submission of forms on the

Controller's website, entails the acquisition of the sender's contact data, necessary to reply, as well as all the personal data included in the communications.

The provision of certain personal data by the interested party is compulsory in order to be able to use the services requested, and failure to provide such data may prejudice access. Mandatory personal data are marked with a star.

In cases where certain data are indicated as not compulsory, the interested party is free to refrain from communicating such data, without this having any consequence on the availability of the service or its operation.

Interested parties who have any doubts as to which data are compulsory are encouraged to contact the Controller.

In particular, data may be collected through:

"BOOK NOW" PAGE

Through the "Book now" page, personal data may be communicated to the Controller.

The data transmitted through this page are processed only for the purpose of enabling the booking and authorising the payment, based on the pre-contractual relationship between the parties.

Cookies and other tracking systems

For details see the cookie policy presented on this website.

Data recipients

The data are processed by authorised company personnel and are not disclosed to unauthorised third parties.

Processing is carried out using computer and/or telematic tools and in automated and/or manual form, in compliance with the provisions of Article 32 of GDPR 2016/679 on security measures, by specially appointed persons and in compliance with the provisions of Article 29 GDPR 2016/ 679.

The Data Controller takes appropriate security measures to prevent unauthorised access, disclosure, modification or destruction of personal data.

In addition to the Data Controller, in some cases, other parties involved in the provision of services and the organisation of this website (hosting providers, IT companies, filing, collection, printing and mailing companies, communication agencies, postal couriers) may have access to the data, as well as external parties appointed, if necessary, as Data Processors by the Data Controller. The updated list of Data Processors can always be requested from the Data Controller.

Transfer of personal data

Data are processed at the Data Controller's operating offices and in any other place where the parties involved in the processing are located. For further information, please contact the Controller.

Personal data of data subject are not transferred outside the European Union.

Storage period

In accordance with the principles of lawfulness, purpose limitation and data minimisation, pursuant to Article 5 of GDPR 2016/679, personal data of data subject

will be retained for the period of time necessary to achieve the purposes for which they are collected and processed or to defend/exercise a right.

When the processing is based on the consent of the data subject, the Controller may keep the personal data longer until such consent is revoked. In addition, the Controller may be obliged to retain personal data for a longer period in compliance with a legal obligation or by order of an authority.

At the end of the retention period, the personal data will be deleted. Therefore, once this period has expired, the right of access, cancellation, rectification and the right to data portability can no longer be exercised.

Rights of the data subject

At any time, pursuant to Articles 15 to 22 of EU Regulation No. 2016/679, the data subject may exercise the right to:

- a) request confirmation of the existence or otherwise of the personal data;
- b) obtain information about the purposes of the processing, the categories of personal data, the recipients or categories of recipients to whom the personal data have been or will be communicated and, when possible, the storage period;
- c) obtain rectification and erasure of data;
- d) obtain the restriction of processing;
- e) obtain portability of the data, i.e. receive them from a data controller, in a structured, commonly used and machine-readable format, and transmit them to another data controller without hindrance;
- f) object to the processing at any time; data subjects are reminded that, where their data are processed for direct marketing purposes, they may object to the processing without giving any reasons.
- g) request the data controller access to and rectification or erasure of personal data or restriction of processing concerning him or her, or to object to the processing, in addition to the right to data portability;
- h) withdraw consent at any time without prejudice to the lawfulness of the processing based on consent given before the revocation;
- i) lodge a complaint with a supervisory authority. The data subject has the right to lodge a complaint with the Italian Data Protection Authority, based in Rome, via di Monte Citorio 121 (tel. +39 06696771), following the procedures and indications published on the Authority's website www.garanteprivacy.it.

Contact details of the Data Controller

To contact the Data Controller, please use the following information:

E-mail: direzione@aparthotelduomo.com

Telephone: +39 0284258510

Postal mail: via Agnello 2, 20121 Milan