

## Privacy Policy (REGULATION EU 2016/679 ex art. 13 GDPR)

Dear Client,

please find below the *policy* about the processing of your personal data by Milano Palace Hotel - MO – Albergo Milano Srl with registered office in Modena, address Corso Vittorio Emanuele II, 68 Modena (MO) VAT number 01949910366 (hereinafter the “*Company*”), in relation to the hotel services provided by the same (the “*Hotel Services*”). Our hotel uses the *Best Western* brand name (by a so-called “*affiliation relationship*”) licensed by the company Best Western International, Inc.

### A. Data Controllers

Independent controllers of the data you provided to the hotel and during your stay are the following:

- the Company, the data processing of which is regulated hereunder;
- Best Western International, Inc. as per separate notice.

### B. Personal data categories

The personal data collected by the Company are: name, surname, residence/domicile, copy of id document, email address, phone number, tax code and/or VAT number, room type, any third party with whom the stay at the hotel is shared with (hereinafter “*Data*”).

The processing of the aforementioned Data by the Company may also concern – subject to your prior express consent – data relating to your health (e.g. disability, for which a special type of room is booked). In such a case, we ensure you that the processing will be restricted only to mandatory data and operations to fulfil the obligations, even at pre-contractual level, relating to the delivery of the Hotel Services, within the limits of the services you requested during the booking or during your stay at our hotel.

### C. Purpose and lawful grounds of data processing

Data is processed for the proper fulfilment of contract and/or law obligations in order to perform the **Hotel Services**.

In addition, your Data is processed in order to fulfil the obligation envisaged by the “*Consolidated Act on Public Security*” (article 109 of Royal Decree no. 773 of 18.06.1931) requiring to notify to the Police Authorities, for public security purposes, the personal details of the hospitality facility residents according to the terms established by the Ministry of the Interior. The data obtained for such purpose shall not be retained at the hospitality facility, unless the resident gives his/her specific authorisation thereto.

Providing Data for the aforementioned purposes is necessary (i) to deliver the Hotel Services and (ii) to fulfil public security obligations. In this respect, it is mandatory to provide such Data for the achievement of the purposes referred to above; if data is not provided or partially or incorrectly provided, it may not be possible to deliver the Hotel Services you requested and, therefore, to host you in our hospitality facility.

**Marketing:** subject to your prior express consent, legal basis of this Regulation the Data collected will be used to send information and/or sales communications, inherent (i) to the Company and the hotel

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at which you decided to stay, and (ii) the “Best Western” world: hotels and services linked to this hotel. Your consent, though optional, is required for the completion of the registration with, and the use of, the above-described communications service. You may cancel your registration with the above service at any time, following the procedure indicated in each communication you receive or sending a specific notice to the Company, to the addresses reported in section H. (*Contact data*).

**Market research and profiling:** finally, subject to your prior express consent, legal basis of this Regulation, the Data will be collected for market research and profiling. In this case, your choice and purchasing habits will be analyzed to create services, promotions, initiatives and communications that are better suited to your behaviors, habits and needs.

Your consent, though optional, is required for the completion of the registration with, and the use of, the above-described communications service. You may cancel your registration with the above service at any time, following the procedure indicated in each communication you receive or sending a specific notice to the Company, to the addresses reported in section H. (*Contact data*).

**Video-surveillance:** for the protection of people, Company and company assets through a video surveillance system of some areas of the structure that can be identified by the presence of appropriate signs.

Data will be collected for purposes of legitimate interest in protecting persons and property involving acts of vandalism, theft, robbery, aggressions, damages and for purposes of fire prevention and work safety by the Company art. 6 paragraph 1 lett. F Reg. UE 679/2016, not subject to your consent.

The recorded images will be deleted after 24 hours, except holidays or other closing days and not beyond 7 days, as required by the law. The data are not communicated to third parties, unless it is required a specific investigative request from judicial authority or judicial police.

### D. Processing terms

Data will be processed by manual and digital tools by the Company employees and collaborators and/or by external entities duly appointed under contract as data processors and data handlers.

Data can be object of extra UE transfer, especially digital ones.

Extra UE transfer are guaranteed by the application of the specifications under articles 44-45-46-47 Reg. UE 679/2016

Data will also be accessible – for the same purposes for which it is collected – by data processors belonging to the following categories:

- ✓ entities providing services for the management of the Company IT system and telecommunication networks;
- ✓ Company advisors or other entities providing services related to the Hotel Service, including Best Western Italia S.c.p.a., with offices in Via Livraghi 1/b, Milan, VAT Number 06865290156

The full list of Data Processors is available on request and may be forwarded to the addresses indicated at the bottom of section H. (*Contact data*).

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### E. Data Recipients

The Data notified will not be disclosed.

### F. Retention Period

The Data collected and processed by the Controller to perform the Hotel Services may be retained for the period envisaged by the applicable regulatory, and tax, provisions.

Regarding Data processing for marketing purposes and for market research and profiling, as described in the foregoing section C., data is processed for a period not exceeding 24 months after its collection **and until your request of service delation.**

**Regarding Data processing for market research and profiling, as described in the foregoing section C., data is processed for a period not exceeding 12 months.**

### G. Which are your rights?

You will be able to: (I) to obtain confirmation of the existence or non-existence of your personal data; (II) know the purposes and methods of data processing, the recipients of the data, the retention period; (III) obtain the rectification or the deletion of data, and where applicable, the processing restriction; (IV) object to the processing; (V) where applicable, receive your personal data provided by the Company in a structured, common format and readable by automatic device. You will also be able to transmit such data to another data controller without impediments by the Company; (VI) file a complaint to the Personal Data Protection Authority.

### H. Contact data

You may contact the Company to enforce the rights listed above, by writing an email to: [privacy@milanopalacehotel.it](mailto:privacy@milanopalacehotel.it) and/or sending a notice to Albergo Milano Srl – C.so Vittorio Emanuele II, 68, 41121 Modena (MO).

I, the undersigned \_\_\_\_\_ ,

*[The following consent request must be completed in case of processing by the Company of special categories of personal data (former sensitive data) relating to the hotel resident's health]*

- after reading the notice above, consent to the processing of the data concerning my state of health for the delivery of the Hotel Services, within the limits and with the terms specified in the notice:

I give consent

I deny consent

