

## PROTECTION OF PERSONAL PRIVACY

### PRIVACY POLICIES

#### INFORMATION (PURSUANT TO ARTICLE 13 OF ITALIAN LAW 196/2003) ON THE PROCESSING OF WEB USERS' PERSONAL DATA.

Dear Sir or Madam,

Please be advised that Italian law 196 of 30 June 2003 (Personal Data Protection Code), provides for the protection of data subjects with regard to the processing of personal data. Pursuant to this law, the personal data of all users who visit the website and access its services shall be processed based on the principles of honesty and transparency, in order to guarantee the privacy and protection of the rights of data subjects.

Pursuant to Article 13 of Italian law 196/2003, we would therefore like to provide the following information:

1. All data collected shall be used for the following purposes: to calculate estimates of costs and send offers, to send advertising material, newsletters, greetings, marketing material, etc.
2. Whilst carrying out its professional duty, the company **Hotel Embassy Srls**, which runs the **Hotel Embassy**, may become aware of the personal identification data described in Italian law 196/03.
3. Processing shall be based on the following principles: automated systems to memorize, process and transmit data using methods closely associated to the purposes themselves, on the basis of the data collected and with your commitment to communicate any corrections, integrations and/or updates to us promptly.
4. Data can only be shared online within the <https://www.hotelembassy.com> website and only communicated for the above-mentioned purposes.
5. Personal data collected during registration may be processed by individuals tasked with data processing and management of the services requested and marketing activities. Moreover, to fulfil legal obligations and in pursuing the above-mentioned purposes, the data may be transmitted:
  - to other hotels within the group;
  - to hosting provider engineers, only following authorisation by the user and only for maintenance and technical interventions

6. The optional, explicit and voluntary transmission of emails to the addresses indicated on this site, necessarily entails acquisition of the sender's email address, which is required in order to reply to requests, as well as other personal data included in the email. Inputting data is:
  - necessary, with regard to data identified as "compulsory" and refusal to provide such data shall imply the inability to complete registration/requests as such data has an identifying and integral value for the use of such services;
  - discretionary, with regard to data identified as "optional" and omission of such data shall not jeopardize provision of the service.
7. The data controller is the company **Hotel Embassy Srls**
8. At any time and pursuant to Article 7 of Italian law 196/2003, data subjects can exercise their rights against the data controller by sending a request to **info@hotelembassy.com**
9. For your convenience, Article 7 of Italian Law 196/2003 is shown below:
10. Article 7 (Data subject's rights and other rights)
  1. The data subject shall have the right to obtain confirmation as to whether or not personal data relating to him/her exists, regardless of whether or not it has already been recorded, and communication of such data in intelligible form.
  2. The data subject shall have the right to be informed of:
    - c. the source of the personal data;
    - d. the purposes and methods of data processing;
    - e. the logic applied to data processing carried out using electronic means;
    - f. identification data concerning the data controller, the data processors and the designated representative, in compliance with Article 5, point 2;
    - g. the entities or categories of entities to whom personal data may be communicated and who may become aware of the afore mentioned data in their capacity as designated representatives in the state's territory, data processors or persons in charge of processing.
  8. The data subject shall have the right to obtain:
    - i. updating, rectification or where interested therein, integration of the data;
    - j. erasure, anonymization or blocking of data that has been processed unlawfully, including data whose retention is unnecessary for the purpose

for which the data was collected or subsequently processed, is not necessary;

- k. a guarantee that the operations as per letters a) and b) have been notified, as also in relation to their content, to the entities to whom or to which the data was communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared to the right that is to be protected.

4. The data subject shall have the right to object to, either in total or in part:

A. to the processing of personal data concerning the data subject, even if they are relevant to the purpose of collection, on legitimate grounds;

B. to the processing of personal data, where it is carried out for the purposes of sending advertising or direct sales material or for the purposes of carrying out market research or commercial communication