

## INFORMATIVA E RICHIESTA DI CONSENSO AL TRATTAMENTO DI DATI PERSONALI

### art. 13 del Regolamento (UE) 2016/679

#### Modulo\_01-Checkin per Farnese

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Dear Guest,

we inform you that according to art 13 of the Regulation EU 2016/679 (GDPR 2016/679) related to processing of personal data, all personal data you provide will be processed lawfully, fairly and in a transparent manner in relation to the data subject, with particular attention to integrity, in a manner that ensures appropriate security of the personal data – from the following

- INCHOTELS S.R.L.
- CAV. SOCRATE INCERTI & FIGLI S.R.L.
- G&G HOTEL MANAGEMENT DI TESAURO GIOVANNI E C. S.N.C.

As co-controllers of the processing, basing this co-ownership on the sharing of data and the purposes of processing, pursuant to the EU regulation 2016/679 on the protection of personal data.

To this end, in compliance with the provisions of art. 13 cited, we inform you that your personal data may be used by each of them, in accordance with the provisions of the Regulation and in relation to the respective main purposes, in the manner indicated below.

#### Data Controllers

The Data Controllers who are independent of the processing of personal data communicated by you to the hotel and during your stay are:

- the Company, whose treatment is governed by this information;
- Best Western International Inc as per separate disclosure.

#### Purpose of data processing

Your personal data are used for the following purposes:

- Fulfilment of the hotel contract, including the compulsory registration and the communication to the local authority of our inhouse guests data, together with compliancy with fiscal and accounting obligations
- Data storage in our server and website to facilitate future hotel check in
- Send communications related to services, newsletters and personalized news with material and promotional offers related to activities and services (ie. promotion, invitation to events, etc) via straight through processes (emails)

#### Special categories of data

Data processing by CAV. SOCRATE INCERTI E FIGLI SRL could concern – following your stated consent – also data related to your health (ie. physical handicap, for which a particular typology of room is requested at time of booking). In these cases, we assure you that the data processing will be limited to the essential operations needed to fulfil to obligations (also precontactive ones) related to hotellerie services, within the services requested at time of booking or during your stay in our hotel. Health data granting is optional, however refusing to give such information will make impossible for the society to fulfil to legal and contractual obligations

#### Way of processing data

Data processing will be automatic and /or manual, with automatic and computerized methods, in respect of security regulation indicated in art. 32 GDPR 2016/679 and carried out by processors on behalf of the controller, according to art. 29 GDPR 2016/679. The controller will apply security measures to guarantee the confidentiality of data and to avoid access to this information from third parties or no- authorized staff.

#### Data retention

We inform you that your data retention period is established for a period of time not exceeding the terms required by law, respecting the principles of lawfulness, limit of purposes and minimization of data, according to art 5 GDPR 2016/679.

#### Nature of Assignment

Data assignment is elective, however refusing to provide your data or the lack of approval on data processing will make impossible for CAV SOCRATE INCERTI E FIGLI srl to offer in full its services

#### Communication and dissemination

Data will not be disseminated. In relation to purposes above, persona data could be communicated to the following addresses:

- Third party consultants in charge for processing / consultancy for substitute for taxes;
- Public entities that need to receive data as per law (social security office, financial office, etc)
- Subsidiaries and other societies linked with CAV SOCRATE INCERTI E FIGLI srl, on charge for activities such as mailing lists.
- Consultants of the Company or other subjects that provide services related to the Hotel Service.

#### Transfer of personal data to third countries

The controller does not transfer personal data to third countries; however, it reserves the right to use cloud services and in this case service suppliers will be selected among who give appropriate safeguards as per art. 46 GDPR 2016/679

#### Controller and DPO

CAV. SOCRATE INCERTI E FIGLI srl is the controller, in the person of its legal representative.

The list of controllers is available at the registered office of the society located in Via Reggio 51/A 43126 Parma. No DPO has been nominated

To assert your rights and / or to request further information, please contact the Controller **CAV. SOCRATE INCERTI & FIGLI S.r.l.** Vat 01644160341, mail: [cavsocrate@pec.it](mailto:cavsocrate@pec.it) or the co-owners of the **INCHOTELS s.r.l.**, VAT nr 02501340349, mail: [inchotels@pec.it](mailto:inchotels@pec.it), and **G&G HOTEL MANAGEMENT OF TESAURO GIOVANNI E C. S.n.c. (P.IVA 02051170344)**, mail: [geghotelmanagement@pec.it](mailto:geghotelmanagement@pec.it), all with registered office and treatment in Via Reggio n. 51 / A - 43126 Parma (PR)

#### Rights of the Data Subject

As per art. 15-22 del GDPR 2016/679, whenever you have right to:

- Request the confirmation of the existence of your personal data and, in case of confirmation, get access to personal data and to information indicated in point b) that follows
- Have indications about purposes of data processing, data categories, addressees or addressee categories your data have been or will be communicated to (especially in case of addressees of third countries or international organizations) and when possible the period of retention
- Amend or cancel your data;
- Limit the data process

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- e) Receive your personal data you have provided to the controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided
- f) Object at any time to the processing and also to processing for direct marketing purposes
- g) Object to automated decisional process, including profiling.
- h) Get confirmation of fulfilment of what indicated in art. 19 GDPR 2016/679 at the point "The Controller", that is the communication – to each of the addresses of the personal data – of possible amendments or cancellations or limitations of the processing according to the art. 16 GDPR 2016/679, except the case in which this fulfilment is impossible or needs an excessive effort;
- i) Suggest complaint to the Authority in charge

The content of this information may be subject to changes due to changes and / or additions to the relevant legislation. Therefore, the Data Controller invites the recipients of the information from now on to read the same also on the company website ([www.inchotels.com](http://www.inchotels.com)), where it will be possible to find the text always updated.

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I the undersigned having read the information provided from the Controller as per art 13 of the Regulation EU 2016/679 (GDPR 2016/679):

☐ I state I've examined the informative note and give consent for processing data necessary for the operations indicated in the note itself according to aims stated in 1) a) Fulfilment of the hotel contract, including the compulsory registration and the communication to the local authority of our inhouse guests data, together with compliancy with fiscal and accounting obligations

#### CONSENT OF THE PERSON CONCERNED TO DATA PROCESSING

I the undersigned having read the information provided from the Controller as per art 13 of the Regulation EU 2016/679 (GDPR 2016/679), give consent for personal data processing necessary for the operations indicated above

- For the purposes listed in point 1 b) "Keep the registration data, including the details of the identification document, inside our servers and portals to facilitate future hotel registration activities"

☐ I authorize ☐ I do not authorize
- For the purposes listed in point 1 c) "Send communications related to services, newsletters and personalized news with material and promotional offers related to activities and services (ie. Promotion, invitation to events, etc) via straight through processes (emails)"

☐ I authorize ☐ I do not authorize
- In relation to particular categories of data, in particular data relating to health (eg physical handicap, for which a particular type of room is requested when booking), necessary for the performance of the operations indicated in the information, within the limits of the services and the services I requested when booking or during the stay at the hotel:

☐ I authorize

SIGNATURE \_\_\_\_\_