

Dear Guest,

Below we provide the information pursuant to art. 13 and 14 of RE 679/2016 regarding the processing of your personal data which will be carried out by CITY HOTELS COMPANY HOLDING S.p.A. with registered office in Via Flaminia 171, Rimini (RN) and by CHC VENEZIA s.r.l. with registered office in Via Flaminia n. 171, Rimini (RN), who can be contacted at the following addresses: tel. 041.715122, email: info@hotelcontinentalvenice.com (hereinafter referred to as "Joint Data Controllers") as joint data controllers, basing this joint controller on the sharing of data and the purposes of the processing, pursuant to art. 26 of R.E. 679/2016 in relation to the hotel services offered by the same.

The processing of data will be based on the principles of correctness, lawfulness and transparency, protecting the confidentiality and rights of all interested parties.

DATA PROTECTION OFFICER

Pursuant to Article 37 of R.E. 679/2016, the Data Protection Officer has been appointed, who can be contacted at the following e-mail address: paola@zprivacy.eu

CATEGORIES OF PERSONAL DATA.

The personal data we collect are: name, surname, residential address, copy of identity document, e-mail, telephone number, tax code and/or VAT number, type of room, any third parties with whom the stay will be shared. The processing of the above-mentioned data may also concern, subject to your express consent, special data, pursuant to art. 9 of R.E. 679/2016. In these cases, we guarantee that the processing will take place limited to the data and operations that are indispensable to fulfil the obligations relating to the provision of hotel services, within the limits of the services and services requested.

PURPOSE OF THE PROCESSING:

1) Hotel Booking Process

In the context of the hotel booking process – whether it takes place online on one of our websites via links to the booking engine of the chain to which it belongs, through an online booking channel, through an app, through travel agencies, through the chain's call centre or directly with the hotel by phone, email or in person – we process your personal data for the purpose of: to allow you to book a room at the hotel of your choice, to check hotel availability and manage your booking, to send you a booking confirmation, to send you non-commercial emails prior to arrival.

Categories of data processed: surname, first name, address, date of arrival/departure, e-mail address, payment card, number and expiry date of the latter, membership number of Club cards, telephone number.

Source of data: directly through you through the online booking form on our website using the link to the website of the chain to which you belong, through the online booking channel used to make the booking, by your travel agent, by the call centre of the hotel chain, directly with our facility with which you have made a direct booking.

Purpose of the processing: processing necessary to perform the residence contract.

2) Check-in e check-out in hotel

When you stay at the hotel, we will collect and process your personal data in order to record your arrival and departure; assign you a room opening key; obtain a credit card to guarantee the payment of the existing stay; manage your hotel registration card; manage the payment of your stay; Process, print or send the invoice for your stay, depending on who is the final payer of the stay, including or not personal extras.

In the event that you have booked a room in one of our hotels but do not go to the establishment – without cancelling – on the date of arrival communicated, we will process your personal data in order to cancel your stay and any other request related to such reservation you may have made; to manage, process and settle any outstanding payments that may still be due based on the type of original booking made.

Categories of data processed: address, reservations, date of arrival and departure, e-mail address, telephone number, first name, surname, first and last name of co-guests, type of payment card, number and expiration date of the same.

Data source: directly at the hotel during check-in.

Purpose of the processing: processing necessary to perform the residence contract.

3) Comply with the obligation provided for by the "Consolidated Law on Public Security" (Article 109 Royal Decree 18.6.1931 n.

773). which requires us to communicate to the Police Headquarters, for public security purposes, the personal details of the customers accommodated according to the procedures established by the Ministry of the Interior (Decree of 7 January 2013). The provision of data is mandatory and does not require your consent, and in case of refusal to provide them we will not be able to accommodate you in our structure.

4) To receive messages and telephone calls addressed to you during your stay. For this reason,

Purpose Your consent is required. You can withdraw your consent at any time. The processing will in any case cease upon your departure;

5) To send communications aimed at detecting the level of customer satisfaction, improving the quality of the service.

The processing is based on the legitimate interest of the data controller (art. 6, par. 1, letter f) GDPR), consisting in monitoring the quality of the services offered, collecting useful feedback and improving the relationship with customers.

6) Stay in the hotel.

When you stay at one of our hotels, we will do everything to make your stay as enjoyable as possible. This requires the processing of your personal data in order to provide specific services during your stay. These services include: cleaning, maintenance, management and return of forgotten items, management of your preferences and those of your guests, dietary requirements.

Purpose of the processing: processing necessary to perform the residence contract.

7) Additional services for hotel guests.

In our hotels you can take advantage of services such as: breakfast, room service, minibar, restaurants, laundry services, parking, taxi request service, free Wi-Fi. In the event that you use additional services, your personal data may be processed in order to manage the use of these services and manage the expenses incurred for these additional services, charging them to the Customer's account, if they are not *free*.

Purpose of the processing: processing necessary to perform the residence contract.

8) Credit limit reports.

To ensure payment by all guests staying in the room, a credit card is required at the time of booking or arrival. To ensure that the credit limit has not been exceeded, we process checks. Such credit limit reports may contain your personal data.

Categories of data processed: date of arrival/departure, first name/surname, type of payment card, number and expiry date of the latter.

Purpose of the processing: processing necessary to perform the residence contract.

9) Loyalty programs

The loyalty program is a loyalty program established by the hotel chain to which it belongs and is valid all over the world, applied and valid according to the individual type of affiliation of the individual hotel and available to Guests staying in our hotels. In this regard, we may process your data in order to allow us to: record the economic results of your stays to record the accumulation of reward points on your card, so that you can always be informed about your accumulation amount and be able to take advantage of the rewards, as soon as a certain sum of points is reached.

Category of data processed: first name, last name, hotel stay details, loyalty program membership number, booking details, email address, address, telephone number.

Source of data: directly through you when you sign up for the loyalty program.

Purpose of the processing: attribution of points related to the hotel chain's loyalty program.

10) Organization of meetings, events.

If you would like to organize an event in one of our hotels or if you would like more information, you can contact the hotel directly. Personal data will be processed for the sole purpose of satisfying your requests to organize a meeting or event.

Categories of data processed: surname, first name, company address, date of the meeting/event, e-mail address, telephone number.

Source of data: directly through you through the information and booking request

Purpose of processing: The data processing is necessary for the conclusion and performance of a contract.

METHODS OF PROCESSING.

With logics strictly related to the purposes of collection, strict procedures and security measures are adopted to store, use and allow you to view your personal data through paper, computer and telematic tools, so as to always guarantee their protection from unauthorized or unlawful processing and from loss, destruction or accidental damage.

In particular, your data are:

- collected exclusively for the purposes declared and subsequently processed in compliance with the same;
- adequate, relevant and limited with respect to the purposes stated above ("so-called data minimization");
- accurate and, if necessary, updated, deleted and/or corrected, also on the basis of your indications, if any;
- used and stored for a period of time not exceeding the achievement of the purposes for which they are collected.

VIDEO SURVEILLANCE.

For the purpose of protecting people, property and company assets through a video surveillance system of some areas of the structure, identifiable by the presence of special signs. Your consent is not required for this processing, as it pursues our legitimate interest in protecting people and property from possible aggressions, thefts, robberies, damages, acts of vandalism and for fire prevention and workplace safety purposes. The recorded images are deleted after five days, except for holidays or other cases of closure of the business, and in any case no later than one week. They are not the subject of communication to third parties, except in the case where it is necessary to comply with a specific investigative request from the judicial authority or the judicial police.

RETENTION PERIOD.

The data collected and processed by the Data Controller to carry out hotel services may be stored for the limitation period provided for by applicable regulatory provisions, including tax provisions.

The data acquired to comply with current administrative, accounting and tax obligations are kept for the time provided for by the respective regulations (10 years, and even more in the case of tax audits).

For purposes whose legal basis is consent, the data will be stored until consent is withdrawn.

To speed up the registration procedures in case of your subsequent stays at our facility. For this purpose, upon obtaining your consent, which can be revoked at any time, your data will be stored for a maximum period of 24 months.

PRINCIPLES APPLICABLE TO DATA PROCESSING.

From the moment of collecting information, any processing we carry out will comply with the principle of relevance and non-excessiveness by virtue of the purposes pursued by the same. We inform you that access to your personal data by authorized subjects is allowed only if knowledge is considered strictly indispensable for the pursuit of the purposes illustrated in this document.

AUTOMATED DECISIONS.

In order to achieve the purposes of this policy, the Data Controller does not implement automated decisions based on your personal data.

SCOPE OF COMMUNICATION AND DISSEMINATION OF DATA

In order to pursue the purposes stated in this document and within the limits of what is strictly necessary, we make use of the activities of external parties with whom specific agreements are entered into on the processing of personal data to regulate the relationships of Ownership/Responsibility pursuant to the Regulation (e.g. external parties who carry out technical consultancy activities, commercial, legal, administrative, companies that provide IT services in the Cloud, data processing services, shipping and transport, banks, bodies, public administrations, authorities, supervisory bodies, etc.).

Internally, the subjects involved in the processing of your personal data are bound to confidentiality, adequately trained and appointed as subjects authorized to process them.

Without prejudice to any legal obligations, your personal data will not be disseminated in any way.

TRANSFER OF DATA ABROAD.

For the purposes stated in this policy, the Joint Controllers do not transfer your data outside the European Economic Area (EEA). However, if your personal data is transferred to countries outside the European Economic Area (EEA), in the absence of an adequacy decision from the Commission of the European Union, we will ensure that appropriate safeguards are in place to protect your personal data in these countries. Some of the safeguards that may be put in place, where appropriate, include the use of standard contractual clauses approved by the European Commission, pseudonymization and, if possible, encryption of the data itself.

By way of example but not limited to, we inform you that the transfer abroad of your personal data is often linked to the use of cloud technologies, digital communication systems, security software and protection of IT services. In these cases, our Company undertakes to use services chosen from among the operators that guarantee greater standards of security and attention to the protection of personal data.

In this regard, we inform you that we use some ICT services, provided by US companies such as, for example, Microsoft, Google and Apple which operate as our Data Processors pursuant to Article 28 of the GDPR.

For this reason, we sign service contracts and "Data Processing Agreements" (DPAs) with these companies which also include the "Standard Contractual Clauses" (SCCs) established by the European Commission pursuant to art. 46, par. 1, GDPR.

However, while selecting, where possible, the provision of such services through Data Centers located within the EEA, the Data Processor may have to allow access to our data to the American authorities as a result of the so-called "Cloud ACT".

RIGHTS OF THE DATA SUBJECT

In your capacity as a data subject, you may exercise the rights referred to in art. 15-22 GDPR:

- Right of access to data (Art. 15, GDPR) Obtain from the data controller confirmation as to whether or not personal data concerning you is being processed and, if so, to obtain access to the personal data and to certain information specifically indicated in Art. 15 of the GDPR.
- Right to rectification (Art. 16, GDPR) Obtain from the data controller the rectification of inaccurate personal data concerning you without undue delay. Taking into account the purposes of the processing, you also have the right to obtain the completion of incomplete personal data, including by providing a supplementary statement.

