

Information for customers on the processing of personal data
pursuant to articles 13 and 14 of the EU Regulation No. 679/2016 (GDPR)

Introduction

Doros Torino S.r.l., as Data Controller pursuant to EU Regulation No. 679/2016 (hereinafter: “GDPR”) invites you, before communicating any personal data to the Data Controller, to read this document carefully because it contains important information on the protection of your personal data.

For personal data, for processing and for all the other nomenclatures indicated in this information, reference must be made to the definitions set out in article 4 of the EU Regulation.

1. Subject and type of data

Doros Torino S.r.l., to manage the bookings at the structure, the consequent fulfilments and to ensure safety, security and integrity of people and the company's assets, will process the personal data of the customer and of any accompanying person, including any personal data belonging to children under 18 years of age.

Personal data may be collected directly from the person concerned or through traditional travel agencies, online travel agencies (e.g. Booking.com) or any natural or legal person who organises events or stays at the facility.

The personal data processed will be:

- **common data:** including personal data of customers and accompanying persons (first name, last name, residential address), copy of identity document, contact data (telephone number and e-mail address), payment data (credit cards or bank details), data relating to the stay, personal preferences, data relating to telephone calls made through telephones in the rooms and images from video surveillance.
- **special data:** e.g. health status (e.g. to meet specific requests) or video surveillance images (in case of disability).

2. Purpose of the processing

The data of the data subject, in this case personal data, are collected for the following purposes:

1. fulfilment of contractual and/or pre-contractual obligations.
2. customer management.
3. communication of the personal details of guests to the Police Headquarters.
4. legally required fulfilments in the administrative, tax and accounting fields.
5. ascertaining, exercising or defending a right of the Controller in court or whenever the judicial authorities exercise their functions.
6. protecting and guaranteeing the safety and security of persons and the integrity and property of company assets through video surveillance.

Specific security measures are observed to prevent data loss, illicit or incorrect use and unauthorized access.

3. Legal basis and mandatory or optional nature of the processing

The legal basis for the purposes set out in sections 2.1. and 2.2. is Article 6(1)(b) of the GDPR ([...] processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract [...]), as the processing is necessary for the provision of services. The provision of personal data for these purposes is mandatory since failure to provide them would make it impossible to use the services provided by the Data Controller.

The legal bases for the purpose set out in section 2.3. are Article 109 R.D. no. 773 of 18 June 1931 (Testo Unico di Pubblica Sicurezza) and Legislative Decree of 7 January 2013, which require accommodation facilities to register and communicate to the Police Headquarters the personal details of guests accommodated. This implies that the provision of personal data is mandatory.

The legal basis for the purpose referred to in section 2.4. is Article 6(1)(c) of the GDPR ([...] processing is necessary for compliance with a legal obligation to which the controller is subject [...]), as the processing is necessary to fulfil legal obligations or to respond to requests from competent authorities, to which the Controller is subject. This implies that such provision of personal data is mandatory.

The legal basis for the purposes referred to in section 2.5. and 2.6. is Article 6(1)(f) of the GDPR ([...] processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject [...]), to establish, exercise or defend a right in court. The processing is mandatory, as it is necessary to satisfy the legitimate interest of the Controller.

The legal basis for the processing of special categories of personal data under Article 9 of GDPR is Article 9(2)(a) of the GDPR ([...] the data subject has given explicit consent to the processing of those personal data for one or more specified purposes [...]). Failure to provide such data may make it impossible to use the services requested.

4. Methods of data processing

Data processing is carried out with the aid of electronic tools or paper supports, in compliance with the security and data protection measures referred to in GDPR and Italian Privacy Law. The processing of personal data is carried out by the Data Controller and by the Data Processor designated by the company. Data processing is carried out by Doros Torino S.r.l. in compliance with the principles of lawfulness, necessity and proportionality of the processing.

5. Data retention

The personal data processed for the purposes referred to in point 2 will be kept for the time strictly necessary to achieve those same purposes as well as up to the period of time envisaged and admitted by the Italian legislation for the protection of the interests and the right of defence of Doros Torino S.r.l., regarding the limitation periods established by the applicable legislation. Specifically, the retention times will be:

- billing data: 10 years after last registration to fulfil administrative, tax and accounting obligations.
- credit card data: 1 month from the date of check-out.
- personal data relating to the stay: 3 years after last check-out, unless otherwise stated by the person concerned.
- video surveillance images: 24 hours after registration.
- data relating to telephone traffic: 90 days from the date of check-out.

6. Recipients of the data

Your personal data may be shared with:

1. subjects that typically act as Data Processors, namely: i) consultant and freelance professionals; ii) subjects delegated to technical maintenance; iii) banks and lenders (collectively "Recipients").
2. subjects, bodies or authorities to whom it is mandatory to communicate your personal data in accordance with the provisions of law or orders of the authorities, included Police Headquarters.
3. persons authorized by Doros Torino S.r.l. to process personal data necessary to carry out activities strictly related to the provisions of services, who are committed to confidentiality or have an adequate legal obligation of confidentiality and who guarantee the processing of data in accordance with the GDPR.

The complete and updated list of Data Processors is kept at the operational headquarters of the Data Controller, located in Grugliasco (TO) and can be sent by sending a written request to the Data Controller at the addresses indicated in the "Data Controller and contact details" section of this document.

7. Rights of the data subject

As a data subject, you have the right to request from the Controller, pursuant to Articles 15-22 of the GDPR, the exercise of the following rights under the GDPR:

- right of access: enables the data subject to obtain confirmation as to whether or not personal data relating to him or her is being processed by the Controller and, where applicable, to access such data and information relating thereto.
- right to rectification: enables the data subject to obtain the amendment of inaccurate personal data relating to him or her without undue delay and, taking into account the purposes of the processing, to obtain the supplementation of incomplete personal data.
- right to erasure: allows the data subject to obtain the erasure of data concerning him/her without undue delay (e.g. when his/her personal data are no longer necessary in relation to the purposes for which they were collected), **subject to the exceptions provided for in the applicable legislation** (e.g. when the retention of data is necessary to comply with legal obligations applicable to the Data Controller).
- right to restriction of processing: allows the data subject, in certain circumstances provided for by the legislation, to obtain the restriction of the processing of his/her personal data.
- right to data portability: allows the data subject, in certain circumstances provided for by the legislation, to receive in a structured, commonly used and machine-readable format the personal data concerning him/her that he/she has provided to the Controller.
- right to object: allows the data subject, in certain circumstances provided for by the legislation, to object to the processing of his/her personal data. In such cases, the Controller shall refrain from further processing the personal data of the data subject, unless the Controller can demonstrate the existence of compelling legitimate grounds for processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims

In any case, the data subject always has the right to lodge a complaint with the Supervisory Authority (Garante per la protezione dei dati personali), pursuant to Article 77 of the GDPR, if he or she considers that the processing of his or her data is contrary to the legislation in force.

In addition, the data subject shall have the right to withdraw his or her consent at any time, without affecting the lawfulness of processing based on the consent before its withdrawal, by contacting the Data Controller at the contact details given in this notice (Art. 7(3) GDPR).

To obtain more information on the processing of your personal data or to exercise your rights, you may contact the Controller as indicated in the section "Data Controller and contact details".

8. Data Controller and contact details

Data Controller is Doros Torino S.r.l., with headquarters in Strada del Portone, 102 - 10095 Grugliasco (TO).

For questions, requests or to exercise your rights, please contact us at the following e-mail address: info@hotelmotelprestige.it or send a registered letter to our registered office.