

PRIVACY POLICY

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

This Privacy Policy:

- it is intended for the website hotelmotelprestige.it (from now on: "website"),
- forms an integral part of the Website and the services we offer,
- is made pursuant to art. 13 of GDPR to those who interact with web services of the website or who contact Doros Torino by telephone by mail, fax or e-mail

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1. DATA CONTROLLER: WHO WE ARE AND WHAT WE DO

Data Controller is Doros Torino S.r.l., with headquarters in Strada del Portone, n. 102 - 10095 Grugliasco (TO), VAT number 01588080992, operating in the branch of hotel and motel management.

2. WHAT DATA WE PROCESS

We inform you that the personal data being processed may consist - depending on how you use our services or otherwise interact with the website - of any information concerning your person that may make you identified or identifiable, including textual information and any other information provided, depending on the type of services requested.

Personal data may be provided voluntarily by the user or collected automatically and will be processed in connection with the following services:

- a. Request for information: to let the user of the website to request information, a box is provided in the dedicated section where name, surname, e-mail address and the specific request are collected.
- b. Bookings' management: name, surname, e-mail address, telephone number, date and time of arrival, hours and/or days of stay, and type of room chosen will be collected to process online bookings. Additional optional data contained in the "Request" box may also be collected.
- c. Browsing data: while browsing the Site, the computer systems and software used to operate the Site may collect certain data such as the user's IP address, operating system and computer environment, browser type, browser ID, date and time of visit, time spent on our services and any errors that may occur while browsing. This data is used for the sole purpose of obtaining any anonymous statistical information on the use of the Site to check its correct functioning, to identify anomalies and/or abuses, and is deleted immediately after processing. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the Site or third parties.
- d. Cookies: information on the cookies used by the website is available at the following URL <https://www.hotelmotelprestige.it/cookie-policy-ue/>

3. WHY WE PROCESS YOUR DATA - PURPOSES OF THE PROCESSING

Your personal data will be processed, with your consent where necessary, for the following purposes, where applicable:

1. allow browsing of the website and the provision of Doros Torino's services through the website
2. answer to specific requests, including the telephonic ones, addressed to Doros Torino
3. manage online bookings
4. fulfil any obligations under applicable laws, regulations or EU legislation, or comply with requests from the authorities
5. to ascertain, exercise or defend a right of the Controller in court or whenever the judicial authorities exercise their functions
6. **for statistical purposes, without it being possible to trace the identity of the user**

Your personal data will also be processed with automated tools.

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

4. LEGAL BASIS AND MANDATORY OR OPTIONAL NATURE OF THE PROCESSING

The legal basis for the purposes set out in sections 3.1., 3.2. and 3.3. is Article 6(1)(b) of 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 optional, but failure to do so would result in the impossibility of activating the services requested.

The legal basis for the purpose referred to in section 3.4. is Article 6(1)(c) of 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 3.5. is Article 6(1)(f) of 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.

It should also be noted that the processing referred to in section 3.6. is not performed on personal data and can therefore be freely carried out by Data Controller.

5. RECIPIENTS OF PERSONAL DATA

Your personal data may be shared, for the purposes set out in section 3. of this Privacy Policy, with:

1. Push Studio, which manage the website
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
3. persons authorized by Doros Torino to process personal data necessary to carry out activities strictly related to the employment relationship, 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 "Contact details" section of this document.

6. RETENTION OF PERSONAL DATA

Personal data processed for the purposes set out in section 3. will be kept for the period of time strictly necessary to achieve those same purposes, as well as, in the case of processing carried out for the provision of services, up to the period of time envisaged and permitted by Italian law to protect the interests and rights of defence of Doros Torino, having regard to the statute of limitations provided for by the applicable legislation.

Further information regarding the period of data retention and the criteria used to determine this period can be verified by sending a written request to Data Controller at the addresses indicated in the "Contact details" section of this policy. In any case, Doros Torino may keep your personal data for the period of time provided for and allowed by Italian law to protect its interests and the right of defence, having regard to the statute of limitations provided for by the applicable regulations.

7. TRANSFERS OF PERSONAL DATA

Personal data are stored on servers located within the European Union. It is in any case understood that Data Controller, if necessary, may also move the servers outside the European Economic Area. In this case Data Controller assures as of now that such transfer will take place in compliance with the applicable legislation based on an adequacy decision or Standard Contractual Clauses approved by the European Commission. Further information is available by sending a written request to the Controller using the contact details indicated in the "Contact details" section of this policy.

8. RIGHTS OF 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, 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.

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 "Contact details".

9. UPDATES

Doros Torino reserves the right to modify or simply update the content of this Privacy Policy, in part or in full, also due to changes in applicable legislation. Therefore, Data Controller invites you to visit this section on a regular basis in order to become acquainted with the most recent and updated version of the Privacy Policy so that you are always up to date on the data collected and how Doros Torino uses them.

10. CONTACT DETAILS

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 located in Strada del Portone, n. 102 – 10095 Grugliasco (TO).