

# PRIVACY NOTICE

Dear Guest,

We hereby wish to inform you that the processing of your personal data will take place with fairness, lawfulness and transparency and will be carried out in compliance with all your rights and, specifically, your confidentiality. Hemeras Srl, Via delle Asole, 4 - 20123 Milan, VAT Number 08424980962 is the Data Controller.

## Object of the treatment

The Data Controller processes the personal and identifying data (for example, name, surname, company name, address, bank and payment references - hereinafter "personal data" or "data") you provide in connection with the provision of hotel services.

### 1. Purpose and legal basis of the processing

Your personal data are processed, where you make a reservation, for the following purposes:

A)- to fulfill the obligations deriving from the contract to which you are a party or to fulfill, before the execution of the contract, your specific requirements; the legal basis is art. 6, paragraph 1, letter b. of EU Regulation 16/679.

- comply with legal obligations (in particular: art. 109 of Italian Royal Decree 18.6.1931 n. 773, which requires us to register and communicate to the local public security authority the details of customers staying), municipal regulations regarding tourist taxes (which require us to record the details of all guests staying for payment of tourist tax), EU legislation, as well as current accounting and tax obligations, the legal basis is art. 6, paragraph 1 letter c. of EU Regulation 16/679.

- exercise the rights of the Data Controller, for example the right of defense in legal proceedings; the legal basis is Article 6, paragraph 1, letter f. of EU Regulation 16/679.

B) Only after your specific consent, for the following Marketing Purposes:

- send you by e-mail, post and/or SMS and/or telephone contacts, communications and/or information and promotional material regarding the initiatives and offers promoted by the Data Controller. The legal basis is Article 6(1)(a) of EU Regulation 16/679.

Please note that if you are already our customers, we may send you commercial communications relating to services similar to those you have already used, unless you object (art. 130 c. 4 D.lg. 196/03). Your consent may always be freely modified (given or denied), in whole or in part, by sending an email to the contact details of the Data Controller.

### 2. Modalities of treatment and storage time of data

The processing of your data is carried out through the operations indicated in art. 4 d.lg. 196/03 and art. 4 n. 2 of EU Regulation 16/679 and specifically: collection, recording, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction of data.

Your personal data is processed both on paper and electronically and/or by automated means.

The Data Controller will process personal data for the time necessary to fulfill the above purposes and in any case for no more than 10 years from the termination of the relationship for the Service Purposes and for no more than 2 years from the collection of data for the Marketing Purposes.

### **3. Recipients of personal data**

Your data may be made accessible for the purposes referred to in art. 2.A) and 2.B):

- to employees and collaborators of the Data Controller, in their capacity as authorized persons and/or system administrators. All the appointed subjects will exclusively carry out the operations of processing, on behalf of the Data Controller, within the limits, with the forms and according to the methods expressly indicated in the respective deeds of appointment.
- to third companies or other subjects (i.e. credit institutions, professional studies, consultants, insurance companies for the provision of insurance services, etc.) that perform outsourcing activities on behalf of the Data Controller, in their capacity as external data processors.

### **4. Nature of data conferment and consequences of refusal to answer**

The provision of data for the purposes referred to in art. 2.A) is mandatory. Without them, we will not be able to guarantee you the Services of art. 2.A). The provision of data for the purposes referred to in art. 2.B) is optional. It may therefore decide not to provide any data or to subsequently deny the possibility of processing data already provided: in this case, it may not receive newsletters, commercial communications and advertising material relating to the Services offered by the Owner. It will in any case continue to be entitled to the Services referred to in art. 2.A).

### **5. Data transfer to third countries**

The Owner does not transfer his Personal Data outside the European Economic Area.

### **6. Rights of the data subject**

Data subjects have the right to ask the data controller to access and rectify or erase their personal data or to restrict the processing of their personal data or to object to their processing (Art. 15 to 21 of the General Data Protection Regulation).

If the conditions are met, the interested parties also have the right to lodge a complaint with the Guarantor as the Control Authority according to the established procedures.

### **7. Methods of exercising rights**

You can exercise your rights at any time by sending an email to [privacy@btoresearch.com](mailto:privacy@btoresearch.com).