



DUETORRIHOTELS



Privacy Policy "Duetorrihotels Luxury Club"

March 2017



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Information note in accordance with Article. 13 of Legislative Decree 196/2003 (protection of personal data)

The purpose of this information note is to clarify the regulations for the protection of personal data, particularly with regard to your rights and how to protect them.

By subscribing to the "Duetorrihotels Luxury Club" program, you accept and give your consent to the processing and to the procedures described below.

1. We will process your personal data for the purposes of

1.1 Collecting and processing the personal data that you provide through your registration to the "Duetorrihotels Luxury Club" program ("Program") through our website www.duetorrihotels.com or through websites of the Group hotels, or by communicating with us by telephone, email or any other means. This information includes that provided when subscribing to the Program, entering a contest, promotion or survey related to the Program, or when using the "Duetorrihotels Luxury Club" card. This information includes your name, address and email address.

1.2 Collecting the following information about your stay in one of our hotels: personal details, date of arrival and departure, the goods and services purchased, home address and telephone number.

1.3 Collecting any personal data or information regarding your preferences expressly communicated by you and information regarding your stay in our hotels: reason for the stay, hobbies and interests, hotel preferred, means of transportation preferred, marital status, smoker, additional notes.

1.4 Accrediting program points.

1.5 Sending promotional emails or sending other communications for marketing purposes including advertisements and other offers.

2. The provision of data

The provision of data is optional for only point 1.3; the refusal to provide data makes it impossible for us to activate your subscription to the "Duetorrihotels Luxury Club" Program.



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3. Archiving and management

The data will be stored both electronically and on paper and will be managed by the staff of our company in charge of processing. If needed, your information may be given to:

3.1 Suppliers, business and productive partners, intermediaries, technical consultants and similar bodies collaborating with our organization to fulfil contractual obligations undertaken with you or their employees;

3.2 Third parties if needed to fulfil an obligation imposed by law or to enforce the terms of use, or the fulfilment of other contractual obligations; or to protect our rights, our property or the safety of our clients or others. This covers exchanging information with other companies and corporations to protect us from fraud and in order to reduce further risks.

If you have been given a password (or you have selected a password) to access certain parts of the website, you will be the only person responsible for keeping this password. We ask that you do not share this password with anyone.

4. Data controller

The Data controller is **DUETORRIHOTELS SPA - via Cartesio, 2 - 20124 Milan, Italy**. To assert your rights, as foreseen by article 7 of Law 196/2003, you can contact the corporate Privacy Manager regarding the Program at the email address luxuryclub@duetorrihotels.com

5. Changes to the privacy information statement

Any changes to our policy will be posted on this page and, where appropriate, you will be notified via email. We kindly ask you to regularly check our privacy statement to check for any updates or changes.



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6. Cookie Law

The purpose of this information note is to clarify the regulations for the protection of personal data, particularly with regard to the rights of the interested parties and how to protect them. In this sense, we inform all those who access our website **duetorri.syshotel-crm.it** and other addresses linked to it that during the consultation of our web pages, personal information and data may be collected when the user voluntarily fills out forms contained in these pages; in that case, the party concerned must first read the privacy policy associated with this processing and allow processing by our company in the manner specified in the same statement.

In order to provide greater information or to facilitate user navigation, it is possible that our website host links to other sites that have not been created by use (e.g. search engines, related solution providers, etc.). The privacy policies applied by these websites are not under our control and the protection provided by this information note are not extend to them; our company does not assume any responsibility for the personal data that could be collected there. Moreover, it is possible to access the Website without prompting the user to grant any personal data.

Nevertheless, during normal operation, computer and software systems used to operate the Website acquire some personal data the transmission of which is implicit when using Internet communication protocols, through the action of files stored temporarily or permanently to your hard-disk (so-called Cookies) and through the use of other software components downloaded or activated while browsing (e.g.. ActiveX components).

This information is not collected for identification purposes, but by their very nature could enable to identify the user through processing or associations.

This category includes the IP addresses of the computers used by the users who connect to the Website, the URL of the resources required, the time of the request, the size of the file obtained as a response, etc.

The provision of data is optional; refusal to provide such data and the blocking of cookies or other software components may make it impossible for us to send the requested information and/or the incorrect operation of the website.

The data collected will be exclusively processed by corporate personnel assigned to this task and will not be transferred or disclosed to other parties.

The data could be used to ascertain liability in the event of computer crimes against the Website or third parties; without prejudice to this, the data on web contacts are not stored permanently.



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7. Detailed information on the use of cookies and consent to their use

DEFINITIONS

Cookies are short pieces of text (letters and/or numbers) that enable the web server to store information on the client (the browser) to be reused during the visit to the website (session cookies) or subsequently, even after many days (persistent cookies). Cookies are stored, according to user preferences from a single browser on the specific device being used (computer, tablet, smart phone). Similar technologies can be used to gather information on user behaviour and on service use.

Subsequently, this document will refer to the cookies and all similar technologies by simply using the term "cookie".

TYPE OF COOKIES

We can identify several categories of cookies based on their features and use:

- **Absolutely necessary cookies.** These cookies are essential for the proper operation of our website and are used to manage the login and access to features unique to the website, in general to accelerate, improve and customize the level of service to users. The duration of the cookies is strictly limited to either the working session (they are deleted when the browser is closed), or of a longer duration, designed to recognize the visitor's computer. Their deactivation may compromise the use of services accessible by logging in, while the public part of the website is normally used.
- **Analysis and performance cookies.** These cookies are used to collect and analyse traffic and to use the website anonymously. Even without identifying the user, these cookies can, by way of example, detect if the same user returns to the website at different times. Moreover, they are used to monitor the system and improve performance and usability. The cookies can be deactivated without any loss of functionality.
- **Profiling cookies.** These are persistent cookies used to identify (anonymously or otherwise) user preferences and improve the browsing experience or to send advertising messages in accordance with the preferences shown by the user during web browsing.

MANAGEMENT OF COOKIE

Access to this site determines installing only technical cookies.

By using the settings in the browser, the user can decide whether or not to accept the cookies.

Warning: Disabling all or part of the technical cookies may compromise the use of the features of the website reserved for registered users. On the contrary, the usability of public content is also possible by completely disabling the cookies.



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The disabling of “third party” cookies does not compromise browsing in any way. The settings can be specifically defined for different websites and web applications. Moreover, the better browsers enable to define different settings for “owner” and “third party” cookies.

By way of example, when using the Tools -> Options -> Privacy menu in Firefox, a control panel is accessed where the user can specify whether or not to accept the different types of cookies and remove them.

Chrome: <https://support.google.com/chrome/answer/95647?hl=it>

Firefox: <https://support.mozilla.org/it/kb/Gestione%20dei%20cookie>

Internet Explorer: <https://support.microsoft.com/it-it/help/17442/windows-internet-explorer-delete-manage-cookies>

Opera: <http://help.opera.com/Windows/10.00/it/cookies.html>

Safari: http://support.apple.com/kb/HT1677?viewlocale=it_IT



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8. Art. 7 - Right of access to personal data and other rights

8.1 You have the right to obtain confirmation of the existence of personal data relating to you, even if not yet recorded, and the communication of the data in intelligible form.

8.2 You have the right to obtain indication of:

- The origin of your personal information;
- The purpose and method of the processing;
- The logic applied in case of processing with electronic tools;
- Identification of the data controller, data supervisor and person in charge of processing appointed pursuant to article 5, paragraph 2;
- Subjects or categories of subjects to whom the personal data may be communicated or who can become aware of it as appointed representative in the State territory, managers or agents.

8.3 You have the right to obtain:

- Updating, rectification or, when interested, integration of data;
- The cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data that is not required to be stored for the purposes for which the data was collected or subsequently processed;
- Certification that the operations referred to in points a and b) have been brought to knowledge, including with regard to their contents, to those to whom the data was communicated or disseminated, except if such compliance is impossible or involves the use of means clearly disproportionate to the protected right.

8.4 You have the right to fully or partially oppose to:

- The processing of personal data relating to you for legitimate reasons even pertinent to the purpose of collection;
- The processing of personal data for purposes of sending advertising materials or direct selling or for carrying out market research or commercial communication.