

## Privacy Policy - Hotel Santa Lucia

Last update: [30/09/2022] - V. [1.0]

**What is this document?** Pursuant to art. 13 European Reg. n. 679/2016 (“**General Data Protection Regulation**” or “**GDPR**”) and in compliance with the principles contained therein, Hotel Santa Lucia intends to inform each user (the “**User**”) about the processing of personal data happening on its website

### Controller and Contact details

Parcianello Gianangelo (hereinafter “**Controller**”, pursuant to art. 4(7) GDPR) with registered offices in Cannaregio, Calle della Misericordia 358, 30121 - Venice.

Contact details: [info@hotelslucia.com](mailto:info@hotelslucia.com)

### Purposes of processing, Legal Basis, Personal Data and Retention period

The Controller processes Personal Data for the following purposes, as specified here in below. The following table also shows the legal basis which justifies the processing and the period of data retention.

Purposes	Personal Data	Legal Basis	Data Retention
A) Management of booking request and accommodation	✓ Anagraphic information (Name and surname) ✓ Financial details (credit card number) ✓ Contact details (email, phone)	Performance of pre contractual and contractual provisions [Art. 6, 1, lett. b) GDPR]	Until the expiry of the data retention period, as provided by the applicable law, and according to Articles 2946 et seq. of the Italian Civil Code.
B) Answer to information requests	✓ Anagraphic information (Name and surname) ✓ Contact details (email, phone)	Performance of pre contractual and contractual provisions [Art. 6, 1, lett. b) GDPR]	For the period of time necessary to answer the User.

C) Allow the Controller to accomplish all formalities required by law.	<ul style="list-style-type: none"> <li>✓ Anagraphic information (Name and surname)</li> <li>✓ Home address</li> <li>✓ Contact details (email)</li> </ul>	Legal obligation [Art. 6, 1, lett. c) GDPR]	Until the expiry of the data retention period, as provided by the applicable law.
D) Improve the website by analyzing how Users navigate and/or use the Website.	✓ Website data usage	Legitimate interest [Art. 6, 1, lett. f) GDPR]	Not applicable (aggregate or anonymous data).
E) Detecting or preventing fraudulent activity and exercising the Controller's rights in Court	<ul style="list-style-type: none"> <li>✓ Anagraphic information (Name and surname)</li> <li>✓ Contact details (email)</li> <li>✓ IP Address</li> <li>✓ domain names of the computers utilised by users accessing the site</li> <li>✓ URI Address (Uniform Resource Identifier) of booking request and the time when the</li> </ul>	Legitimate interest [Art. 6, 1, lett. f) GDPR]	10 years

The provision of data for purposes A) and B) is necessary to make a reservation at the accommodation and/or to request information. Failure to provide the data will make it impossible to proceed with the requested service.

### Processing modalities

The processing of Personal Data will take place through automated and/or manual tools in order to ensure proper security measures to prevent access, disclosure, loss, incorrect, illegal or unauthorized use of data.

### **Data sharing**

Your Personal Data may be shared with the following external subjects: (i) Internet service providers, software companies and platforms used by the Controller as communication and promotion channel or for booking services (e.g. Nozio S.r.l. for booking service, whose privacy policy is available at the following [link](#)); ii) consultants and other third-party service providers who perform services for us or on our behalf and require access to such information to do that job; iii) authorities, government agencies, or judicial courts to meet any applicable law, regulation, legal process, or enforceable governmental request.

These subjects act as autonomous Data Controllers or Data Processors. In the latter case, the Controller has signed a contract pursuant to Art. 28 GDPR (Data Protection Agreement or “DPA”).

The list of data processors is available by sending a request to the Data Controller at [info@hotelslucia.com](mailto:info@hotelslucia.com).

Personal Data will also be processed by the Controller's internal staff specifically authorised pursuant to Article 29 of the GDPR.

### **Data Processing Locations**

Personal data are processed and stored at the headquarters of the Controller, as well as in the servers that host the Website and the booking engine software established in EU. Transfers of Personal Data outside the EEA shall be carried out only with appropriate safeguards, such as adequacy decisions, standard contractual clauses approved by the European Commission or other safeguards provided for in the GDPR.

### **Data subject's rights**

The User may exercise all the rights provided for by Articles 15-21 of GDPR, at any time and without unjustified limitations, by contacting the Data Controller at [info@hotelslucia.com](mailto:info@hotelslucia.com). Requests shall be filed free of charge and processed by the Controller within 30 days.

Specifically, the User can:

- obtain from the Controller confirmation as to whether or not Personal Data are being processed (Art.15);
- obtain from the Controller the rectification of inaccurate Personal Data or the completion of inaccurate ones (Art. 16);
- obtain from the Controller the erasure of Personal Data (Art. 17);
- obtain from the Controller restriction of processing (Art. 18);
- have the right to receive his/hers Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller (Art. 20);
- have the right to object (Art. 21);
- with regard to the purposes of processing based on consent, withdraw that consent at any time.

**Complaints**

In any case, Users are always entitled to lodge a complaint with the competent supervisory authority (Garante per la Protezione dei Dati Personali), under Art. 77 of the Regulation, if they believe that the Data Controller's processing of their Personal Data is in violation of the applicable law.

**Amendments**

The Controller reserves the right to amend and update that Privacy Policy as a result of any further new or revised provisions of any national and EU laws and regulations on personal data protection.