



## PRIVACY POLICY

In compliance with Articles 12 et seq. of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection / General Data Protection Regulation, "Regulation" or "GDPR"), and in general in observance of the principle of transparency set forth in the regulation itself, the following information is provided on the processing of Personal Data (i.e., any information concerning an identified or identifiable natural person identified or identifiable: "Data Subject") carried out in connection with the use of the website [www.thecaesarhotels.com](http://www.thecaesarhotels.com) ("Site").

Therefore, this information concerns the processing of personal data carried out both during navigation and in the eventual interaction of the User with Consorzio Gitav, with communications or with the use of services, including through the member area.

In case the User uses links on the Site to interact with entities third parties (e.g., social media) the latter will act as the Holders of the processing of the User's data processed by them at that point, and the User is therefore invited to read the relative privacy policies on the processing of personal data that the same are required to provide.

Availability checks and bookings are made by linking to the Simplebooking.it site managed by Zucchetti Group, which acts as a separate data controller and whose [privacy policy](#) is available for consultation, noting that the request data will be transmitted from the Simplebooking.it site to the company for which the User has made the relevant request.

### SUMMARY TABLE OF KEY INFORMATION

Purpose (point 2)	Categories of data (point 3)	Legal Basis (point 4)	Duration (point 5)	Communications to parties other than employees or managers of the treatment (point 6)
Functioning and security of the site <a href="#">Cookie Policy</a>	Data of navigation	Legitimate interest of the Holder to the activity of enterprise and security	No later than 24 hours	No
Contractual (Contact and use of services on the Site)	Common data such as master data, contact data, referring company, login credentials, etc.	Need to initiate measures pre-contractual at the request of the Interested Party or execution of contracts of which the Interested Party is party. Interest legitimate interest in the legal protection.	Prescription of rights. In case at the request does not followed by the stipulation of a contract, the data personal will be deleted within the end of the tourist season	No
Direct marketing	Common data such as call sign, number telephone number, address e-mail	Consent	No later than 48 months after consent or its renewal	No

For the processing of personal data using cookies, please refer to the specific [policy statement](#).

#### 1. DATA HOLDER

The data controller (i.e., the entity that determines the purposes and means of the processing of personal data) is Consorzio Gitav (hereinafter also the Data

Controller). Consorzio Gitav, headquarter in via Pontedera 5 - 00161 ROMA, C.F. and P.I. 14983601007, pec gitav@pec.it.

For contacts specifically related to the protection of personal data, including the exercise of the rights referred to in paragraph 8 below, we indicate the email address: info@gitav.com to which you are kindly requested to address any of your requests

## **2. PURPOSES OF PROCESSING**

Personal data may be processed for the following purposes:

2.1 the smooth operation and security of the Site (**purposes of operation of the Site**);

2.2 management services and support through the Site to customers, installers, dealers etc., such as responding to requests for information and support on the installation, use and maintenance of their products, etc. (**service management purposes**);

2.3 the promotion and sale of products carried out through letters, telephone, automated communication systems, e-mail, etc., and market and customer satisfaction surveys customer satisfaction (**direct marketing purposes**)

## **3. TYPE OF DATA PROCESSED AND MODE OF COLLECTION**

The data being processed belong to the category of common data, such as those indicated below.

The systems and programs used for the operation of the Site collect some personal data whose transmission is implicit in the use of the protocols of Internet communication protocols ("**Browsing Data**" e.g. IP addresses or domain names of the computers used by users who connect to the Site, the URI addresses – Uniform Resource Identifier – of the requested resources, time of the request, method used in submitting the request to the server, size of the file obtained in response, numeric code about the status of the response rendered by the server -good end, error, etc.- and other parameters related to the operating system and the environment computer environment of the user).

Although this information is not collected to be associated with identified data subjects, by their nature, they could, through processing and associations with data held by third parties, make it possible to identify the users and are therefore considered Personal Data. In connection with the navigation information collected, we then remind you to read our [information](#) on the use of Cookies.

We will then process data from provided by the User or otherwise resulting from your interaction with the Site, including through chat, the contact section, or the sending of messages by the User, such as: - first name, last name, contact details, number and age of family members or other travelers.

For the data processed in the **Career** section, please refer to the specific [disclosure](#).

#### **4. MANDATORY OR NON-MANDATORY NATURE OF THE PROVISION AND LEGAL BASIS OF THE PROCESSING**

As mentioned, the transmission of Navigational Data is inherent in the use of the Site and the legal basis for the processing of Personal Data for **the purpose of the operation of the Site** is the related legitimate interest of the Data Controller in the performance of its business activities, including about security and protection from misuse.

The provision of data requested in connection with the **Site services** and **information provided in contact communications** by the User is optional and the failure to provide the same will have the only consequence that it may be impossible for the User to benefit from the services or for the Controller to provide the answers requested. The legal basis for the processing of such data is, pursuant to b) of Art. 6 GDPR, the need to follow up on User requests of a pre-contractual or contractual nature (e.g., requests for product information or quotes; configuration of purchased products).

Regarding **direct marketing purposes**, the provision of data personal data is optional and failure to provide it will have no consequence in relation to the contractual relationship or on the possibility of using the services of the Site. Such processing is carried out only with the consent of the recipient (in this context, consent is also necessary for persons legal persons), which is always revocable (see point 8 below, "Rights of the Data Subject"), which constitutes its legal basis. It is specified that the revocation of consent or opposition to processing carried out through modalities automatic methods of contact (automated calling or communication systems of call and with electronic communications carried out by means of mail electronic, telefax, messages of the Mms or SMS type or other) extends to traditional ones (paper mail, operator call), but it remains without prejudice to the possibility of exercising this right only in part, opposing, for example, only the sending promotional communications through automated systems

#### **5. PROCESSING METHODS AND DATA RETENTION PERIODS**

Processing will be carried out:

- using manual and automated systems;
- by personnel specifically authorized and trained in the performance of the related tasks;
- with the use of appropriate measures to ensure the confidentiality of the data and prevent access to the same by unauthorized third parties.

With reference to the marketing purpose, it is specifically noted that Personal Data will also be processed through:

- the use of automated calling or calling communication systems;
- electronic communications carried out by means of electronic mail, messages of the SMS (Short Message Service) type, WhatsApp and instant messaging in general, push or other types;
- the use of operator telephone and paper mail.

Browsing data are deleted – except in the case of detection of activity unlawful – no later than 24 hours after their collection. For marketing purposes, data will be processed for a period not exceeding 48 months from the granting of consent or its renewal. Data related to Site services will be retained for as long as necessary for the provision of the service and the verification of its performance; ordinarily, therefore, the data will not be kept longer than 6 months after the use of the service.

The data related to a contractual relationship will be kept for the duration of the same and at the end - limited to the data necessary at that point - for the fulfillment of all possible legal obligations and for the needs of protection, including contractual protection, connected with or arising from it; ordinarily, therefore, the data will not be kept beyond 10 years from the termination of the relationship contractual relationship.

## **6. COMMUNICATION OF DATA**

The data collected and processed may be communicated, exclusively for the purposes specified above, to:

- all parties to whom the right of access to such data is recognized by virtue of regulatory provisions;
- collaborators, suppliers of the Data Controller, as part of their duties and/or contractual obligations relating to the execution of the contractual relationship with the Data Subjects; the Data Controller's suppliers include by way of example, banking and credit institutions, insurance companies, consultants attorneys; shipping managers; suppliers of software and related support; specifically particular, our software structure for the operation of the Site is also managed through lubenda s.r.l. (cookies) and Growens S.p.A. (newsletter service) who act as our Data Processors. You may in any case request a complete and updated list of the subjects appointed as Data Processors by contacting one of the contacts below. The data are not subject to disclosure.

## 7. DATA PROCESSING AREA

Personal Data will be processed within the European Union, and it is not the intention to transfer them outside of that territory.

## 8. RIGHTS OF THE DATA SUBJECT

The GDPR grants the Data Subject the exercise of the following **rights** with respect to the personal data concerning him/her (the summary description is indicative, for the full enunciation of the rights, including the limitations of the same, please refer to the Regulations, and in particular Articles 15-22):

- **Access** to personal data (the Data Subject has the right to have free of charge the information regarding the personal data concerning him/her held by the Controller and the processing thereof, as well as to obtain a copy in an accessible);
- **Rectification** of personal data (upon notification of the Data Subject, correction, or integration of personal data - not an expression of evaluative elements - not correct or inaccurate, including those that have become so because they have not been updated);
- **deletion** of personal data (right to be forgotten) (e.g., data are no longer no longer necessary in relation to the purposes for which it was collected or processed; it has been processed unlawfully; it must be deleted to fulfill a legal obligation; the data subject has withdrawn consent and there is no other legal basis for the processing; the Data Subject objects, given the existence of the conditions, to the processing);
- **limitation of processing** (in certain cases - contestation of the accuracy of the data, in the time necessary for verification; contestation of the lawfulness of processing with opposition to deletion; necessity of use for the rights of defense rights of the Data Subject, while they are no longer no longer useful for the purpose of processing; if there is opposition to processing, while necessary verifications are carried out - the data will be stored in such a way that it can be eventually restored, but, in the meantime, it is not be accessed by the Data Controller except precisely in connection with the verification of the validity of the request for restriction by the Data Subject, or with the consent of the Data Subject or for the establishment, exercise or defense in judgment of a right in court or to protect the rights of another person natural or legal person or for reasons of important public interest of the Union or of a Member State);
- **Opposition** in whole or in part, for reasons related to the situation particular situation of the Data Subject, to processing carried out based on

legitimate interest; to object to processing for marketing or profiling purposes, you will not even need to justify such Your decision;

- **Data Portability** (where the processing is based on consent or a contract and is carried out by automated means, upon its request, the Data Subject will receive in a structured, commonly used and machine-readable format automatic device, the personal data concerning him/her and may transmit them to another Data Controller, without hindrance from the Data Controller of the Processing to which he or she has provided it and, if technically feasible, may obtain that said transmission be carried out directly by the latter).

In addition, if the processing takes place by virtue of consent (see previous point 4), it will be possible **to revoke consent** at any time, without this affect the lawfulness of the processing given before the revocation (as indicated in point 4 above, with reference to the processing of data for the purpose of marketing, you may revoke your consent to the processing even for only one of the mode, traditional or automatic, of communication). The easiest way to express revocation of consent will be the link at the bottom of our communications or the personal panel in the restricted area of the Site.

The Data Subject also has the right to lodge a complaint with the **Guarantor for the Protection of Personal Data** if he/she believes that the processing concerning him/her violates what is prescribed by the legislation on the protection of personal data; the Guarantor for the Protection of Personal Data can be contacted through the contact details indicated on the Site of the Authority itself "[www.garanteprivacy.it](http://www.garanteprivacy.it)". We would like in any case to have the opportunity to address in advance any concerns of Data Subjects, who may contact the e-mail address [info@gitav.com](mailto:info@gitav.com) or the other contact details of the Controller indicated above for any clarification regarding the processing of data personal data concerning them and for the exercise of the related rights, including the revocation consent.